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FINAL

ENVIRONMENTAL IMPACT STATEMENT

JOHNSON VALLEY to PARKER MOTORCYCLE RACE

SEPTEMBER 1980

PREPARED BY:

Department of the Interior
Bureau of Land Management
Riverside, California

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1980

United States Department of the Interior

IN REPLY REFER TO

BUREAU OF LAND MANAGEMENT

STATE OFFICE
Federal Office Building
2800 Cottage Way
Sacramento, California 95825

September 19, 1980

Dear Reviewer:

Enclosed for your review and comment is the final environmental impact statement for the proposed Johnson Valley to Parker Motorcycle Race, San Bernardino County, California. The event is proposed for October or November 1980. The proposed route runs approximately 235 miles through the California Desert Conservation Area, starting at the Johnson Valley Open Area and ending at the start/finish of the Parker SCORE "400" course.

Written comments, and those given at a public meeting held September 4, 1980, were considered in revising the EIS. As a result, changes were made in mitigation, course marking and course width requirements. Patton's Trail alternative was ammended to avoid a dangerously fast segment, a section of private land and an area used as access to Cadiz Lake mines. A new "Public Comment" alternative was added that considers eight proposed course alignments that either add to the safety of the originally proposed course or decrease the potential impacts that an event would cause.

Written comments concerning the Final EIS will be accepted until October 24, 1980. Comments should be sent to:

Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
P.O. Box 305
Needles, California 92363
Telephone: (714) 326-3896

Comments on the Final EIS received in the mail will be considered before a final decision is made.

Sincerely,

Gerald E Hillier
Gerald Hillier
Riverside District Manager

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DENVER, CO 80225

ADDENDUM

It was discovered after the document had been sent to the printer, that the following paragraph had inadvertently been omitted from Chapter II, page II-13, "Course Marking":

> "The start, finish, and pit areas will be flagged and roped to delineate the permitted zones of use. The four pit areas will be limited to four acres each. The sponsor estimates there will be approximately 50 vehicles at each pit area and will encourage participants to share pitting services."

We have included as part of this addendum the letter received from the Environmental Protection Agency granting the BLM a waiver from the prescribed EIS review period. The EPA letter explains the conditions of the waiver.

Also attached are two letters of comment on the draft EIS, from the California Resources Agency and the Sierra Club, which were received after this final EIS was submitted to the printer. Our responses to these organizations' concerns are included after each letter.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

calling 9/17/80

17 SEP 1980

OFFICE OF THE
ADMINISTRATOR

Mr. George Lea
Deputy Director
Bureau of Land Management
U.S. Department of the Interior
Washington, D. C. 20240

Dear Mr. Lea:

I have received and reviewed your August 27, 1980 transmittal, together with your September 15, 1980 clarification, requesting a waiver of the prescribed EIS review period for the Johnson Valley to Parker Off-Road Vehicle event.

You have requested a three day waiver of the minimum 90 day period between the notice date for the draft EIS and the Agency decision. According to information you have provided, this would require you to make your permit decision on the day the off road vehicle event is scheduled to take place. (In fact a 5 day waiver would be required to meet this schedule.)

As you know, the CEQ regulations state that EPA upon showing by the lead Agency of compelling reasons of national policy, may reduce the prescribed period. In administering this function, EPA has also attempted to define the "compelling" reasons of national policy within the context of the effect a waiver would have on the "real opportunity" to alter the decision based on public input.

After carefully reviewing the information provided by you and talking with both proponents and opponents of the project, I believe there is a national policy issue involved but that substantive differences of opinion also exist which must be considered in the final EIS.

As you described it, the national policy aspect of this action stems from the fact that small group usage in the desert has been increasing, thereby creating a proliferation of tracks, trails and roads which impact the national resources and complicate management of the public lands. You further state that large organized clubs are an asset in the effort to control ORV utilization of public lands in a responsible manner and that an a priori elimination of this particular event would decrease the effectiveness of the large organized clubs as a management tool. Without passing on its specific merits, I believe this is a valid concept of a national level policy to be explored by the BLM.

I am deeply concerned, however, that unless special measures are taken for the remainder of the NEPA process, a "real opportunity" for the public to interact with the BLM decision process will not exist. The concept of scheduling the decision date for the day the event is to be held does not lend itself to careful or objective decision making nor does it allow the public to seek adjudicatory relief.

To mitigate these difficulties, I believe a waiver of ten (10) days is required, subject to the following conditions:

1. The Final EIS is to be filed with EPA no later than September 19, 1980. The Notice of Availability for the Final EIS will appear in the Federal Register on September 26, 1980 with an announced review period of 24 days ending on October 20, 1980.

2. On or before September 19, 1980, BLM will contact all commentors with major concerns and inform them of the revised schedule.

3. Copies of the FEIS will be delivered (by hand if necessary) to the commentors no later than September 22, 1980.

4. BLM will enhance, as possible, communication with the commentors during the review period.

5. BLM will inform all commentors of the final permit decision no later than October 22, 1980.

If you have any questions concerning this action, please contact me.

Finally, I anticipate that events such as this will occur on a regular basis and in many instances will require environmental impact statements to assist decision making. I would hope that your commitment to the integrity of the NEPA process will prevent a reoccurence of situations such as this.

Sincerely yours,

William N. Hedeman, Jr.
Director
Office of Environmental Review

SIERRA CLUB
Southern California Regional Conservation Committee

43730 Higbee
Lancaster CA 93534
13 Sept. 1980

Dick Barbar, Chief of Resources
Bureau of Land Management
2800 Cottage Way
Sacramento CA 95825

Sir:

At the advice of John Bailey of the Needles RA, I am sending these final comments on the proposed Johnson Valley - Parker motorcycle race to your office. They are intended to supplement the comments that Ike Eastvold and I have previously submitted to Dick Crowe on behalf of the Sierra Club. While I believe we have already addressed most of the substantive site-specific and procedural points, I would like to briefly highlight them and clarify a couple of other points.

In my letter of 11 August 1980, I presented four areas of particular concern for resource damage. There is a subsequent internal memo prepared by Bruce Ottenfelt on a meeting he had with Bob Terrazas and I on route realignments that further discusses these concerns. John Bailey asked what our resource concerns around the Iron Mountains are, and I will simply refer to the Cadiz-Danby EAR, which I believe details them fairly well.

20-1 Not all the problems with the use of the south end of Cadiz Valley (under either of the alternatives proposed in the draft EIS) are directly related to specific resource values. We believe that the use of this area is in violation of the provisions of the Interim Critical Management Plan (ICMP), in that there are no routes of travel that meet the ICMP definition. Our field review has not revealed any continuous route running along the proposed race route from the pit area over to the Iron Mountains and north along their lower slopes. No such route is apparent until you reach the northeast corner of the range. Similar ICMP problems exist in the use of the western portion of WSA 304A and in the section running east from the Ragtown area.

Furthermore, even in areas where such routes do exist, the 50 foot corridor proposed for the race seems clearly to violate the ICMP prohibition on the widening of routes. Keep in mind that not all routes are equal in their ability to carry traffic; and a single track through fragile soils may support a few users in single file traveling at sensible speeds but be totally inappropriate for several hundred motorcycles under race conditions. This measure of suitability is missing from the EIS, where all routes seem to be treated as equal.

20-2 The ICMP will shortly be replaced by the new Desert Plan, and we have serious concern that this event will result in a pre-commitment of this race course without a full public disclosure as part of the Plan. Ike has presented this fully in his 7 Sept 1980 letter, and I will not repeat his arguments.

As I tried to make very clear to Bruce at our meeting, we are watching the Bureau's proposed mitigation measures (and their success, if the event is held) as a test of whether or not Class L lands can be crossed by competitive ORV events. As part of this test, I am rather disappointed to see both BLM and the race organizer so ready to dismiss efforts to control the style of the race through this short section by use of speed limits or no passing rules, both provisions that were deemed fasible when the question of such racing in Class L was initially discussed.

20-3 One continuing issue has been the question of whether or not existing routes are present in several areas, and if so, how substantial they are. As the Bureau intends to use existing photographic data (from 1977) as the basis for route identification as part of the Desert Plan, it remains a mystery to me why such documentation was not included in the draft EIS (instead of the rather vague and selective photographs that were used.) I also strongly recommend that a before and after comparison of good aerial photography be made a part of your monitoring proposal. Such data is an essential complement to ground-based surveys.

20-4 We have raised repeatedly our concern about the use of WSA 304A as a part of the race course. I have serous reservations about the ability of the race organizers and the Bureau to conduct an event of this size in compliance with the Interim Management Policy and Guidelines for WSA's. This concern is two fold: first, it will be impossible to traverse the western portion of the WSA (before reaching the lava flow) without causing severe disturbance; and second, that there is no realistic provision in the EIS for the reclamation and recovery called for by the IMP. (See page 15 of the IMP). I fear that once this event is run, we will be faced with a fait accompli instead of an area requiring restoration.

20-5 Finally, there are three procedural points which have not been fully presented. Normally, ORV events in Johnson Valley have a fairly brief EAR published which addresses the specific course and references impacts to the programatic EAR. Even this level of documentation is missing from the EIS. This event is significantly larger than normal for the Johnson Valley area, and some supplemental information should be provided. The intent of the Johnson Valley area was to permit ORV use in compliance with existing regulations, not to create a sacrifice area. Although the Bureau has not established the monitoring programs it stated it would, it still has a responsibility to document use of the area.

20-6 Secondly, if the BLM request for a reduction in the required public comment period is obtained, it appears that it is your intention to issue the permit on the day of the event. It is my understanding that this would preclude our use of the normal administrative appeal channels if we have an objection to the permitted action, as the State Director's office and IBLA would both be closed on a Saturday. In view of the substantial problems that exist with the

20-6 nature of the event itself, the procedural questions surrounding its relationship to the ICMP and CDCA Desert Plan, and the inadequacy of the draft EIS there is a significant probability that we may have such an objection. Under the circumstances, we may have to turn to preliminary injunctive relief, a far less satisfactory procedure. The Bureau has been extremely negligent in its timing in this whole effort, and has generated problems itself that a 1 July EIS release would have precluded.

20-7 Finally, the Bureau and the EIS are deficient in approaching the problem of private lands crossed by the course. The problem of addressing the impacts on such sections and of obtaining landowner permission to cross them is a major hurdle in planning an event of this scope, and should not be overlooked as a mere procedural technicality.

Thank you for the opportunity to comment on this proposed event. I look forward to seeing your response (in both word and deed) to the concerns we have raised about it.

Sincerely yours,

Jim Dodson

JIM DODSON
Chair, Desert Committee

Cy to: Gerry Hillier
Dick Crowe

20-1 See p. II-28.

20-2 See p. II-28, V-42, Response #12-2.

20-3 We are considering including such comparison in our monitoring program.

20-4 See p. II-26, Measure #5.

20-5 The Environmental Analysis Record for Competitive Off-Road Vehicle Events in Designated Vehicle Use Area 30 - Upper Johnson Valley (1976) is referenced in the EIS (p. I-2). It was determined by management that no further impact assessment for this part of the course was necessary. The Upper Johnson Valley Competitive Area is designated as "Open Sponsor Option," which means that the area is open to sponsor-designed competitive ORV events without restrictions on vehicle travel except that vehicles be operated in a responsible manner (p. 2, Johnson Valley EAR).

20-6 Please see the letter from the Environmental Protection Agency, which outlines their conditions in granting a waiver from the required 90 day/30 day time periods.

20-7 This EIS documents the environmental assessment for both public and private lands along the proposed course and alternatives. An addendum report is being prepared for the San Bernardino County that will allow the County Environmental Review Board to determine from the EIS what specific impacts would occur on private land. The Board will then determine the adequacy of the EIS and addendum in fulfilling their EIR requirements. The sponsor must obtain written permission from private landowners affected by the proposed action.

Resources Building
1416 Ninth Street
95814

(916) 445-5656

Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Boating and Waterways
Department of Parks and Recreation
Department of Water Resources

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GOVERNOR OF
CALIFORNIA

THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

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and Development Commission
Regional Water Quality
Control Boards
San Francisco Bay Conservation
and Development Commission
Solid Waste Management Board
State Coastal Conservancy
State Lands Commission
State Reclamation Board
State Water Resources Control
Board

SEP 12 1980

Mr. Dick Crowe, Area Manager
Cima Resources Area Office
Bureau of Land Management
P.O. Box 305, Front Street
Needles, CA 92363

Dear Mr. Crowe:

The State of California has reviewed the draft environmental impact statement for the Johnson Valley to Parker Motorcycle Race, submitted through the Office of Planning and Research in the Governor's Office. The State's review, in accordance with the provisions of Part II of Office of Management and Budget Circular A-95 and the National Environmental Policy Act of 1969, was coordinated with the Departments of Conservation, Fish and Game, Parks and Recreation, Water Resources, and Transportation; the Air Resources and State Water Resources Control Boards; and the State Lands Commission.

The Department of Fish and Game (DFG) has the following recommendations which are necessary to compensate for project impacts on resources and desert habitats:

21-1 1. The route selected for this race should be limited to existing roads and trails. The proposed route should be modified to avoid the 40 acres of presently undisturbed habitat.

21-2 2. The final report should identify the areas inhabited by bighorn sheep in the Sheephole and Bullion Mountains. Although Pit #2 will be located far north of the summit of Sheephole Pass, plans should include provision for excluding large concentrations of people from the summit area.

21-3 3. BLM, U.S. Fish and Wildlife Service, and DFG should reach agreement before the race on procedures for quantification and replacement for animal and plant losses.

21-4 4. The report should identify measures to protect one of the largest creosote rings in Johnson Valley near the course origin, as well as for the extremely diverse vegetation in the canyon east of Box Canyon. Special consideration should be given to the damage that spectators may cause.

Questions regarding these comments should be directed to Fred Worthley, DFG, 350 Golden Shore, Long Beach 90802 or (213) 590-5113.

The State Lands Commission (SLC) has the following comments:

21-5 1. The maps in the report indicate that ten parcels of State-owned school lands are in the vicinity of the race course (see attached list). The applicant states that only one parcel will be affected. The exact route, therefore, is uncertain at this time, and the final report should show the correct route.

21-6 2. Several of the ten parcels have been used for military maneuvers, and may contain unexploded ordnance. The applicant is aware of this problem, but the insurance policy for this event must, at the applicant's expense, include coverage against this problem and must name the State as an additional insured.

21-7 3. SLC may require rerouting to avoid State parcels where further investigations reveal potential adverse effects, or it may require that racers be confined to narrow corridors along existing public roads. Pit or spectator use of State parcels will not be allowed.

21-8 4. SLC believes that the bond covering possible damage to archaeological sites should cover all such sites affected, not just those on BLM lands.

21-9 5. Since the "undisturbed" area east of Pit 2 is included in a Wilderness Study Area, and since the race route may cross the State-owned Section 16, T 6 N, R 9 E, SLC recommends that the course follow the existing road indicated on the map.

21-10 6. The "free area" near the race's start will receive damage in a wider swath than the rest of the course will. The final report should contain, therefore, a more thorough evaluation of the existing soil disturbance in this area and its sensitivity to further disturbance. SLC wants to know if this area can sustain the cumulative damage of annual use for this activity.

21-11 7. The final report should fully address the applicant's proposals for monitoring and controlling race activity, which are all-important in minimizing environmental damage. SLC is considering having an observer go over the final course before the race, or stationing a staff member on affected State parcels.

We appreciate having an opportunity to review this report.

Sincerely,

James W Burns

JAMES W. BURNS
Assistant Secretary for Resources

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

SCH 80073005

ATTACHMENT

PARCELS OF STATE-OWNED SCHOOL LANDS IN THE VICINITY OF THE RACE COURSE - 1980 JOHNSON VALLEY TO PARKER MOTORCYCLE RACE

(San Bernardino Meridian)

1. Sec. 16, T.6 N., R.3 E. - Inside free start area
2. Sec. 36, T.7 N., R.4 E. - " " " "
3. Sec. 16, T.7 N., R.7 E. - S. of course, W. of Ludlow
4. Sec. 16, T.6 N., R.9 E. - Along course, E. of Ludlow
5. Sec. 16, T.3 N., R.15 E.- Cadiz Dry Lake, S. of course
6. Sec. 16, T.2 N., R.15 E.- " " " ,E. of Patton's trail
7. Sec. 16, T.1 N., R.16 E.- On course, 6 mi. N. of Pit 3
8. Sec. 36, T.1 N., R.16 E.- Along course, 6 mi. E. of Pit 3
9. Sec. 36, T.2 N., R.17 E. - N. of course, Danby Lake
10. Sec. 36, T.2 N., R.22 E.- On course at Hwy 95 crossing

21-1 The proposed route has been modified to avoid approximately 40 acres of relatively undisturbed wildlife habitat in Cadiz Dunes. This was the most important wildlife habitat identified in the draft EIS. Other portions of the proposed alternative courses cross roadless terrain whose values, in terms of wildlife habitat, are substantially less than those of the avoided Cadiz Dunes.

21-2 The public comment alternative totally avoids the Sheephole and Bullion Mountains. If the event is permitted, it is likely that this alternative would be adopted.

21-3 We agree, and earnestly invite the U.S. Fish and Wildlife Service and the California Department of Fish and Game to join and supplement our monitoring efforts on the day of the race, should it be permitted.

21-4 The final EIS (p. II-26, #2) identifies measures to avoid and/or protect creosote rings in Johnson Valley. The very large creosote ring in Johnson Valley is not near the start area. The exceptionally diverse vegetative assemblage in the canyon east of Box Canyon is avoided, at AMA's request, in the public comment alternative.

21-5 The course is shown on the maps; the scale of the maps precludes great detail. In response to this concern, information on the exact route with respect to State land sections was given to Hans Feickert of the State Lands Commission by Telephone on September 11, 1980.

21-6 Unexploded ordnance was looked for while the course was laid out and disposed of when found. Only one section of State land is crossed by the course and is outside the zone where ordnance can reasonably be expected to be found. The relationship of the applicant and the State in terms of insurance for actions on State lands is outside the jurisdiction of the BLM.

21-7 The proposed course crosses the corner of one section of State land, making use of the Parker 400 road. No pit areas are located there and no spectators are expected.

21-8 No archaeological sites have been located on any State lands on or near the course. Only one site was located on any private land along the course and that site is protected by terrain.

21-9 The proposed course does follow a pole line road (see p. II-10 of the EIS).

21-10 The soils in the Johnson Valley Open Area are no more sensitive or insensitive to disturbance than any other desert area. Designation of the area as open to vehicle use was a management decision based on public demand and relative lack of resource values. The Johnson Valley Open Area, therefore, can sustain the cumulative effects of annual use for this activity as well as the many other competitive events held in the Open Area each year.

21-11 Monitoring of the race is the responsibility of the sponsor. The BLM will require monitors at key areas (p. II-12) to ensure compliance with permit stipulations and to minimize environmental damage. BLM monitors as well as the sponsor's monitors have, and will exercise when necessary, the authority to disqualify any participant not complying with those stipulations.

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ENVIRONMENTAL IMPACT STATEMENT

JOHNSON VALLEY to PARKER MOTORCYCLE RACE

SEPTEMBER 1980

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PREPARED BY:

Department of the Interior
Bureau of Land Management
Riverside, California

STATE DIRECTOR, CALIFORNIA STATE OFFICE

JOHNSON VALLEY TO PARKER MOTORCYCLE RACE
ENVIRONMENTAL IMPACT STATEMENT
SAN BERNARDINO COUNTY, CALIFORNIA

FOR FURTHER INFORMATION CONTACT:

Gerald E. Hillier, District Manager
1695 Spruce Street
Riverside, California 92507

RESPONSIBLE AGENCY:

Lead Agency: Bureau of Land Management (BLM)

( ) Draft (X) Final Environmental Impact Statement

ABSTRACT: The proposed action is to permit a point-to-point motorcycle race this fall. The course runs approximately 235 miles starting in Johnson Valley Open Area and ending at the start/finish of the SCORE Parker 400 course.

Alternatives to the proposed action include:

Patton's Trail Alternative - This alternative is identical to the proposed action save for a minor change in course alignment which follows Patton's Trail and an old military road (Piccadilly Lane) from the northern part of the Cadiz Valley to pit area 3.

Public Comment Alternative - Based on public comments received to date, the BLM is considering 8 specific course realignments. These are analyzed collectively in one alternative. The final course might be any one of the alternatives in this document or a combination of alternatives.

No Race Alternative (No Action) - The only alternative to the proposed action, other than course changes, is not to authorize a point-to-point competitive ORV event.

SUMMARY

PROPOSED ACTION AND ALTERNATIVES

This environmental impact statement analyzes the impacts of a proposed point-to-point motorcycle race across approximately 235 miles of the California Desert Conservation Area with the possibility that it will become an annual event. It also analyzes the impacts of two alternatives to that proposal.

PROPOSED ACTION

The proposed action is to permit a one-day point-to-point motorcycle race this fall (October or November, 1980) with the possibility that it will become an annual event. The course runs approximately 235 miles across the southern Mojave Desert starting in the Johnson Valley Open Area (Anderson Dry Lake) and ending at the start/finish of the SCORE Parker 400 course. A mass start consisting of two waves of 400 participants each is proposed. The course runs on approximately 178 miles of existing roads and trails, 42 miles of old race courses which have since been obliterated and 15 miles of areas devoid of existing roads and trails. The course passes through one (already impacted) wilderness study area (304 A) and partially borders three wilderness study areas (304, 305, and 307). The proposed course crosses state or county roads five times and a railroad once. There are four pit areas spaced at approximately 40 to 50 mile intervals. This is not planned as a spectator event; numbers are not known at this time but are not expected to be significant. A monitoring program will evaluate the effects of the proposed action on environmental resources after each use of the course.

PATTON'S TRAIL ALTERNATIVE

This alternative is identical to the proposed action save a minor change in course alignment. At the northern end of Cadiz Valley, the proposed course proceeds southeast around the east side of the Cadiz Dunes and continues south to pit area 3. The alternate course follows Patton's Trail south-southeast from the northern end of Cadiz Valley for 24.5 miles, then turns east for two miles and continues south on an old military route

(Piccadilly Lane) to pit 3. Piccadilly Lane and a relocated pit 3 are changes which evolved from public comments. This alternative avoids the Cadiz Dunes and reduces the distance of the course by approximately 4 miles. Eight to ten percent of the course would still be located in the Johnson Valley Open Area with 186 miles on existing roads and trails, 34 miles on old race courses which have since been obliterated, and 11 miles in areas off existing routes.

PUBLIC COMMENT ALTERNATIVE

Based on comments received, the BLM is considering eight specific course realignments that collectively comprise this alternative. Five of these changes were proposed by the Checkers Club of AMA, District 37, two were proposed as a result of discussions with the Sierra Club and one more change was required because of a private land issue. The major changes are the relocation of pit 1 a few miles north of its proposed location, the rerouting of the proposed course around the southern end of Bristol Dry Lake and consequent relocation of pit 2, and a new route which avoids sensitive and important resources in the Cadiz Dunes by going through the Kilbeck Hills and thence connecting with the proposed course east of the Iron Mountains.

NO RACE ALTERNATIVE (NO ACTION)

The only alternative to those discussed above is not to authorize a point-to-point competitive ORV event. The area in question would continue to be managed according to the principles of multiple use ans sustained yield.

IMPACT SUMMARY

PROPOSED ACTION

Impacts on environmental resources would be relatively minimal on approximately 178 miles of the proposed race course as these portions run in Johnson Valley Open Area and along existing roads and trails. The remaining portions of the course would sustain moderate to heavy short-term impacts depending upon the nature of the environment, existing impacts and degree of environmental sensitivity. In those areas lacking well-defined routes of travel, the proposed event would create dust and noise and damage or destroy some vegetation and wildlife habitat. Certain soils would be compacted; some animals would be disturbed, injured or killed; some archaeological sites might be damaged or destroyed; and relatively minor disturbance to an already impacted wilderness study area (WSA 304 A) would occur.

PATTON'S TRAIL ALTERNATIVE

Adverse impacts on resources under this alternative would be the same as under the proposed action except those portions of the proposed segment running to the east of Cadiz Dry Lake would be avoided. All of Patton's Trail and Piccadilly Lane comprise established routes of travel. Compared to the proposed course running through the Cadiz Dunes, environmental impacts along this alternative would be minimal except possibly for a few miles which pass through a sandy area (poorly defined route) by the northwest portion of Cadiz Dry Lake.

PUBLIC COMMENT ALTERNATIVE

This alternative avoids a number of significant areas identified in the draft EIS. These areas are the wash along the eastern edge of WSA 207 identified as having sensitive vegetative and wildlife resources, an area near the Sheephole Mountains where a CNPS listed rare species was located, and the Cadiz Dunes which were identified as the most important and significant wildlife habitat along the proposed course.

NO RACE ALTERNATIVE (NO ACTION)

Under this alternative, no point-to-point motorcycle race would be authorized. Existing impacts and actions responsible for modifications of the areas in question would continue to occur. All impacts attributable to the event would thus be avoided.

MAJOR AREAS OF CONTROVERSY

Wilderness Study Area 304 A

Controversy exists as to whether the wilderness values found in WSA 304 A, through which a portion (13.5 miles) of the proposed course runs, will be impaired before Congress can determine the area's wilderness status.

Potential National Register Archaeological Sites

Two districts potentially eligible for the National Register of Historic Places are identified as occurring along the course. Further examination of these districts is necessary to determine if they are indeed eligible. If these districts require mitigation, controversy would exist as to whether mitigation would satisfactorily prevent adverse impacts.

Vegetative Resources

One species of plant listed on the California Native Plant Society's list of rare and endangered plants was observed and three more species are expected along the course. Two more species listed as rare in California but common elsewhere were observed (and two more expected) along the course. Controversy exists over potential impact to creosote rings in Johnson Valley. Large rings exist in the southern part of the Johnson Valley Open Area and smaller rings were located in upper Cadiz Valley.

Sensitive Wildlife Species and Habitat

Controversy exists as to what level of potential impact on BLM Sensitive species or important wildlife habitat is acceptable. The desert tortoise is the only officially listed sensitive species (an official list of approximately 30 species is soon anticipated) and portions of the course pass through tortoise habitat. A portion of the proposed course runs through the Cadiz Dunes and peripheral sand hills which are identified as being important habitat to wildlife.

Roads Versus Non-Roads

Portions of the proposed race course traverse areas which have no existing roads, trails or definable routes of travel. The Interim Critical Management Plan (ICMP) for vehicle travel in the California Desert specifies rules of use for specific areas, restricting use to existing or designated routes of travel, closing areas, or opening areas to unrestricted use. Controversy exists over the ICMP meaning of an existing road or trail, whether old tank tracks left by war maneuvers constitute existing routes, and the environmental merits of authorizing a competitive ORV event that crosses areas without obvious physical disturbance. There is also a question of how long tracks created by a race would last.

The California Desert Plan

The Proposed California Desert Plan will have a public review period of 30 days beginning October 1, 1980. The public review period of this EIS precedes that of the Desert Plan by only a short period of time. Concern has been expressed that important elements of the Desert Plan are being modified to "fit" the proposed action addressed in this EIS. Other comments have criticized the separate review of the two proposals and have asked why the race proposal was not considered in the context of the desert-wide plan.

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Chapter I

Purpose and Need

PURPOSE AND NEED FOR ACTION

There is a recognized need for competitive off-road vehicle events in the California Desert. ORV enthusiasts feel that their rights have been severely constrained by government-imposed vehicle management plans in the California Desert. Plans such as the BLM's Interim Critical Management Plan (ICMP) designated relatively small areas specifically for off-road vehicle use; however, these areas tend to preclude long, point-to-point courses for competitive events. Recent applications for competitive, point-to-point races have met stiff controversy and have become a rallying point for off-road enthusiasts. to redress this imbalance in ORV management, the Bureau is considering the establishment of one or more long-distance corridors for competitive off-road vehicle events. This will provide an additional recreational opportunity for off-road vehicle enthusiasts.

The Checker's Motorcycle Club of the American Motorcyclist Association (AMA), District 37, sponsored a point-to-point motorcycle race beginning in the early 1950's and continuing until 1977. The course varied from year to year, but since 1968, always ended in the vicinity of Parker, Arizona. From 1961 to 1974, portions of the proposed course and alternatives have been used for these races several times in the past. No permits were required for the race until 1972, when environmental assessments were first required for the event.

Since 1975, the Club has applied for a permit for the race following BLM's permit system for ORV events, but time and manpower constraints to do the necessary environmental assessments have led to denial of each application. Last year (1979), with assistance from the AMA to fund an environmental assessment/monitoring program, a permit was offered but the courses approved by the BLM were not acceptable to the sponsor for reasons of safety and race appeal.

To meet the needs of the ORV community for a long distance point-to-point race course that met AMA and BLM standards, BLM initiated field work during late fall of 1979 to locate and assess a suitable course more or less as proposed by the Checkers Club but with modifications made to avoid known environmental problems and concerns. This environmental impact statement analyzes the impacts, both positive and negative, of a proposed point-to-point motorcycle race starting at Johnson Valley Open Area and ending at the start/finish area of the Parker 400 race course. It also analyzes the impacts of alternatives to that proposal.

Of the 235 miles of proposed race course, approximately 175 miles (75 percent) are covered in existing environmental assessment reports (Map 1.1). These documents are:

Environmental Analysis Record for Competitive Off-Road Vehicle Events in Designated Vehicle Use Area 30 - Upper Johnson Valley (1976).

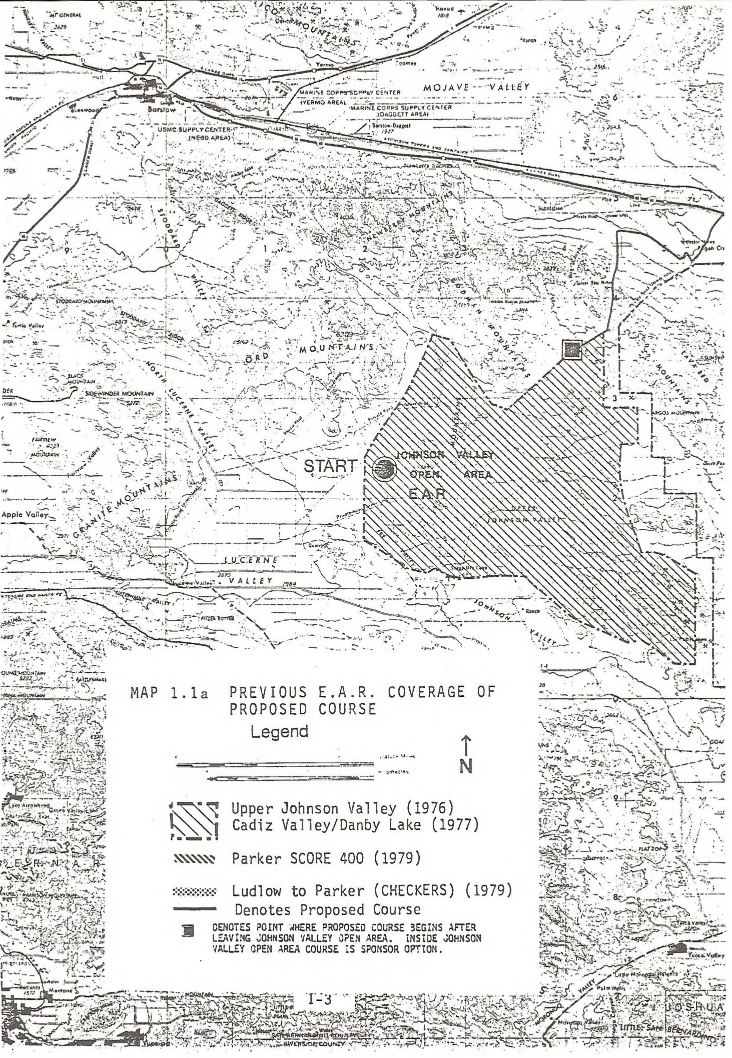
Environmental Assessment Record, 1979 Checkers Motorcycle Race.

Cadiz Valley/Danby Lake Environmental Assessment Record (1977).

Environmental Analysis Record for Proposed Parker "400" Desert Race (1979).

The Cadiz/Danby EAR and the 1979 Checkers Race EAR were attempts to locate areas suitable for competitive events and whose environmental consequences were acceptable to the BLM and the public. Scoping and public participation during the review processes of these two assessment efforts has allowed nearly everyone, whether singly or in groups, to air their views on motorcycle use in southern San Bernardino County. Public review for this EIS has included written comments on this issue since 1977, comments received at public meetings over the last three years, the most recent being September 4, 1980 and several facilitation meetings during the fall of 1979.

Through this extensive public involvement, contact with other agencies and "in house" review, the BLM has identified major areas of concern. Issues tentatively identified are: (1) the relationship of the proposed action to the development and implementation of the Proposed Plan for the California Desert Conservation Area; (2) whether a Wilderness Study Area through which the proposed course runs will sustain impairment of wilderness characteristics; (3) cultural resources including potential National Register districts occur along portions of the course and will require mitigation to avoid sustaining impact; (4) rare or endangered plants or significant vegetative resources occur along portions of the course and could sustain impact; (5) Wildlife - potentially threatened portions of the course and could sustain impact; (6) the relationship of the proposed action to the Interim Critical Management Plan and the attendant controversy over what actually constitutes an acceptable route of travel.



MAP 1.1a PREVIOUS E.A.R. COVERAGE OF PROPOSED COURSE

Legend

N

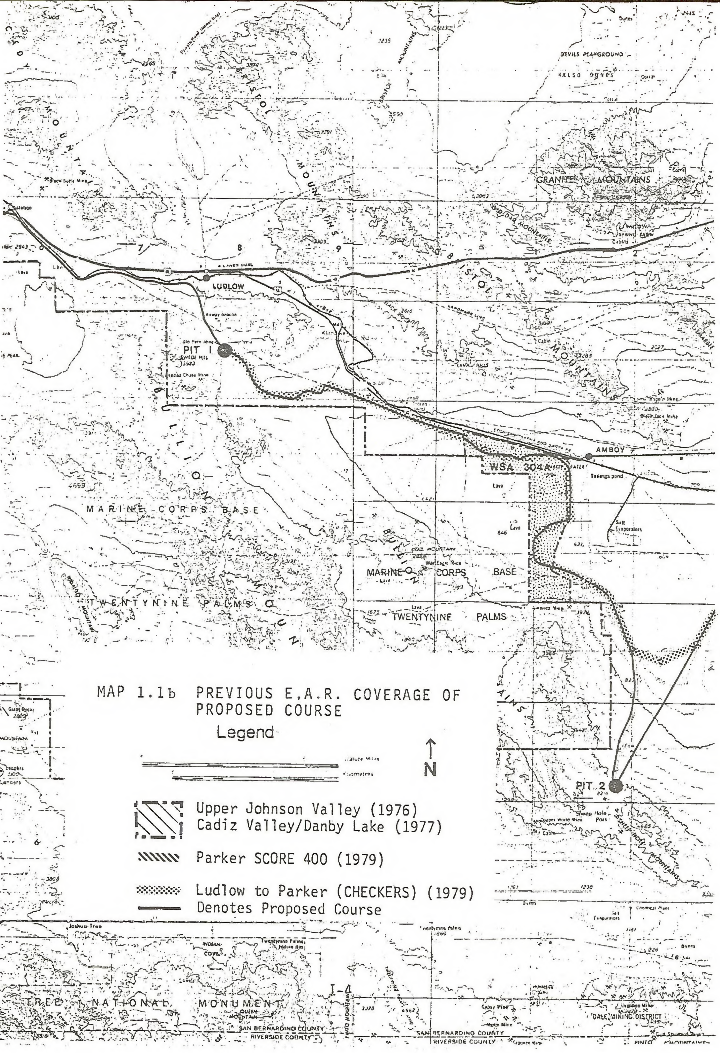
▨ Upper Johnson Valley (1976)
Cadiz Valley/Danby Lake (1977)

▨ Parker SCORE 400 (1979)

░ Ludlow to Parker (CHECKERS) (1979)

— Denotes Proposed Course

■ DENOTES POINT WHERE PROPOSED COURSE BEGINS AFTER LEAVING JOHNSON VALLEY OPEN AREA. INSIDE JOHNSON VALLEY OPEN AREA COURSE IS SPONSOR OPTION.



MAP 1.1b PREVIOUS E.A.R. COVERAGE OF PROPOSED COURSE

Legend

▨ Upper Johnson Valley (1976)
Cadiz Valley/Danby Lake (1977)

▨ Parker SCORE 400 (1979)

▒ Ludlow to Parker (CHECKERS) (1979)

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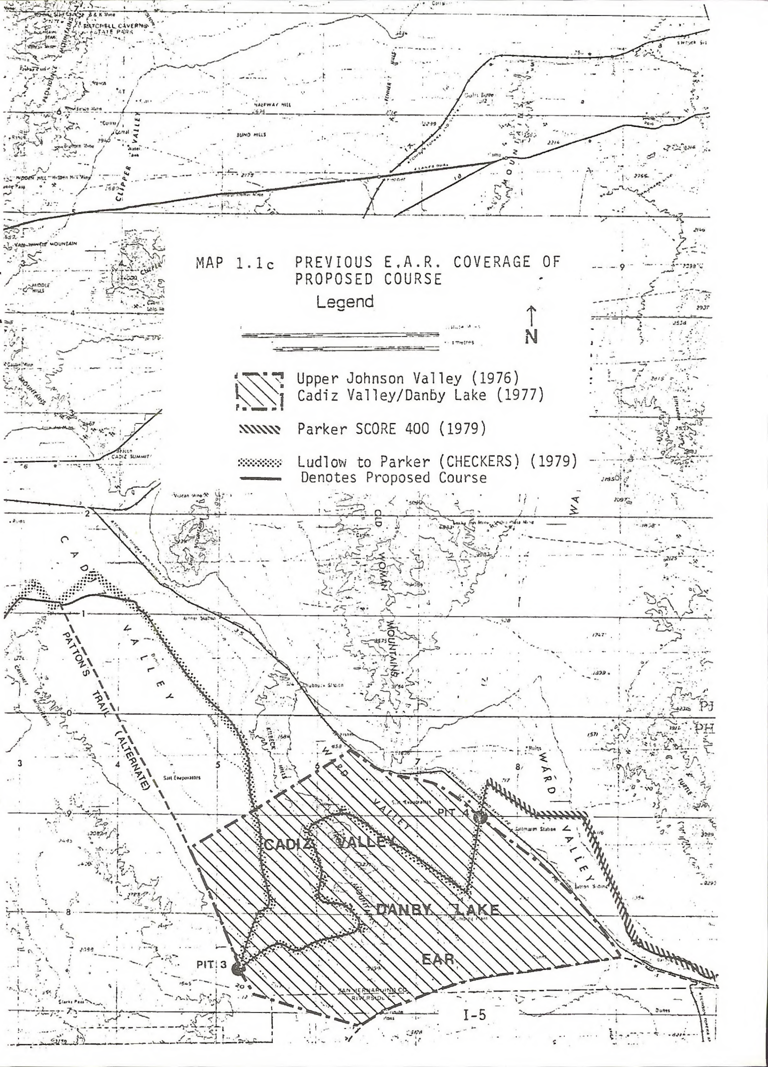
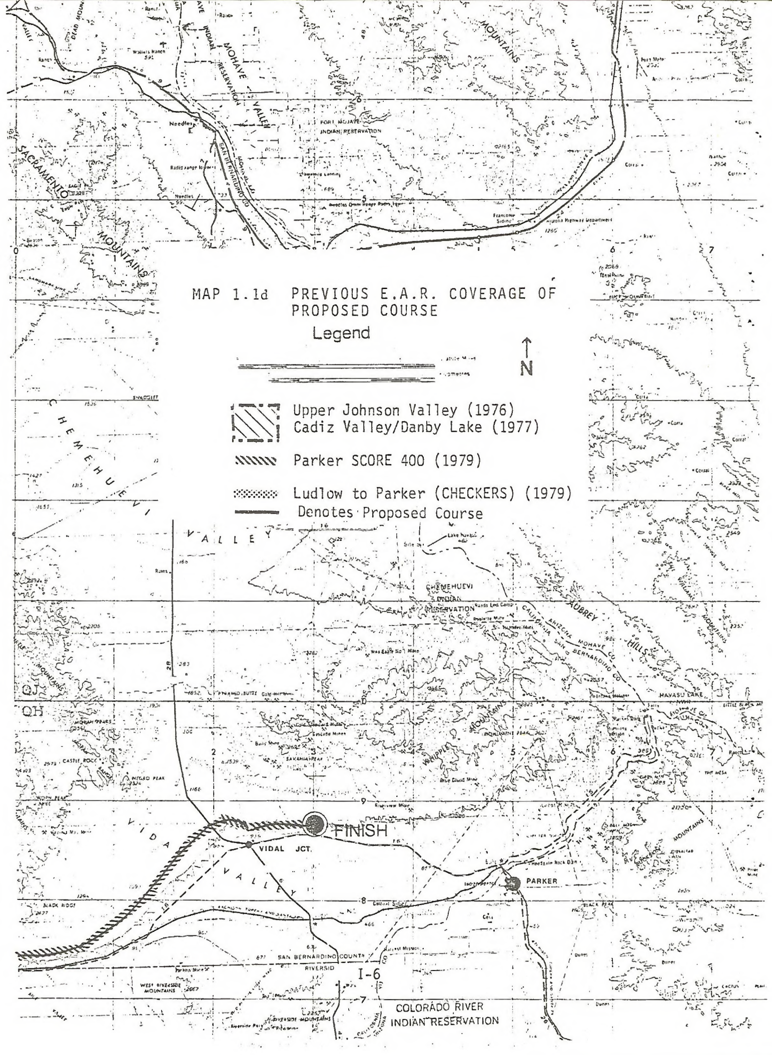


MAP 1.1c PREVIOUS E.A.R. COVERAGE OF PROPOSED COURSE



MAP 1.1d PREVIOUS E.A.R. COVERAGE OF PROPOSED COURSE

Chapter II

Proposed Action and Alternatives

PROPOSED ACTION AND ALTERNATIVES

PROPOSED ACTION

The proposed action is to permit a point-to-point motorcycle race this fall with the possibility that it will become an annual event. The duration of the event will be approximately 10 to 12 hours during one calendar day. The maximum number of participants allowed will be 800. The course runs approximately 235 miles, starting in the Johnson Valley Open Area and ending at the start/finish area of the Parker SCORE 400 race course (Map 2.1).

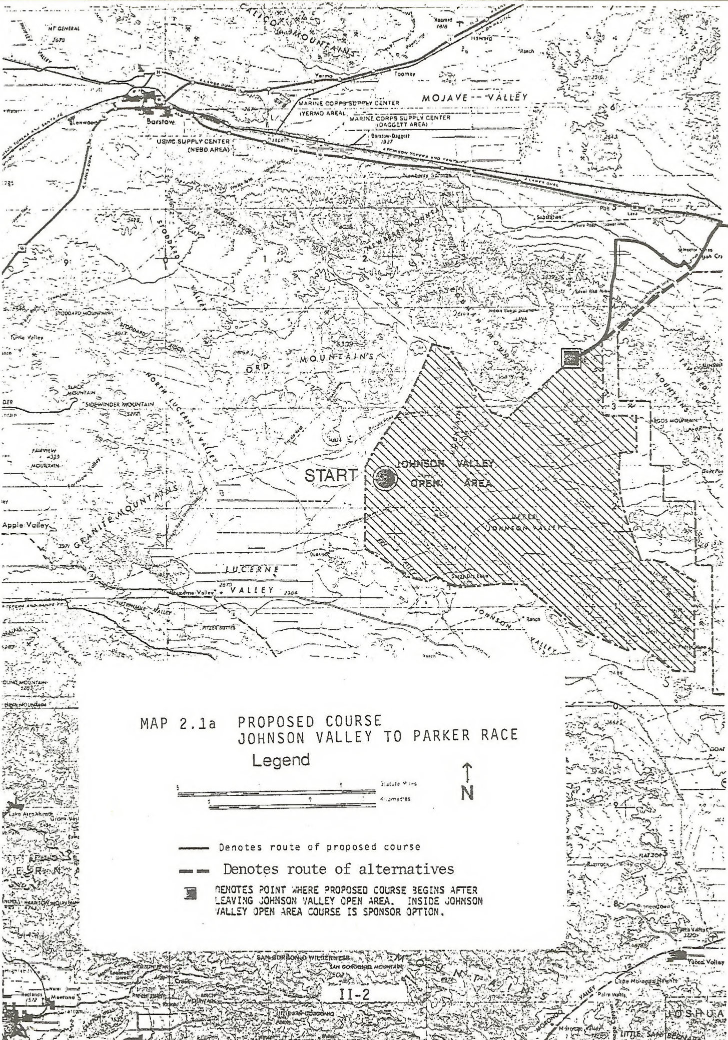
Course Description

The proposed course is approximately 235 miles in length (Map 2.2). Existing roads and trails comprise approximately 65 percent of the course while another eight to ten percent is located within the Johnson Valley Open Area. The remaining portions are routed through areas without definite roads or trails. Some of these roadless areas show obvious disturbances such as tank and ORV tracks while other portions run through washes or sandy areas where previous road or trail definition is obliterated by occasional runoff or wind (Table 2.1).

Table 2.1

Breakdown of Types of Surface Traversed
by the Proposed Race Course

	Percent	Miles
On Existing Routes		
1. On roads and trails (includes JVOA)	76	178
2. On old race course that has since been erased but is recognized as existing under BLM's Interim Critical Management Plan	18	42
Off Existing Routes		
3. Areas with many tank and ORV tracks	4	9
4. Undisturbed areas	2	6
TOTAL	100	235



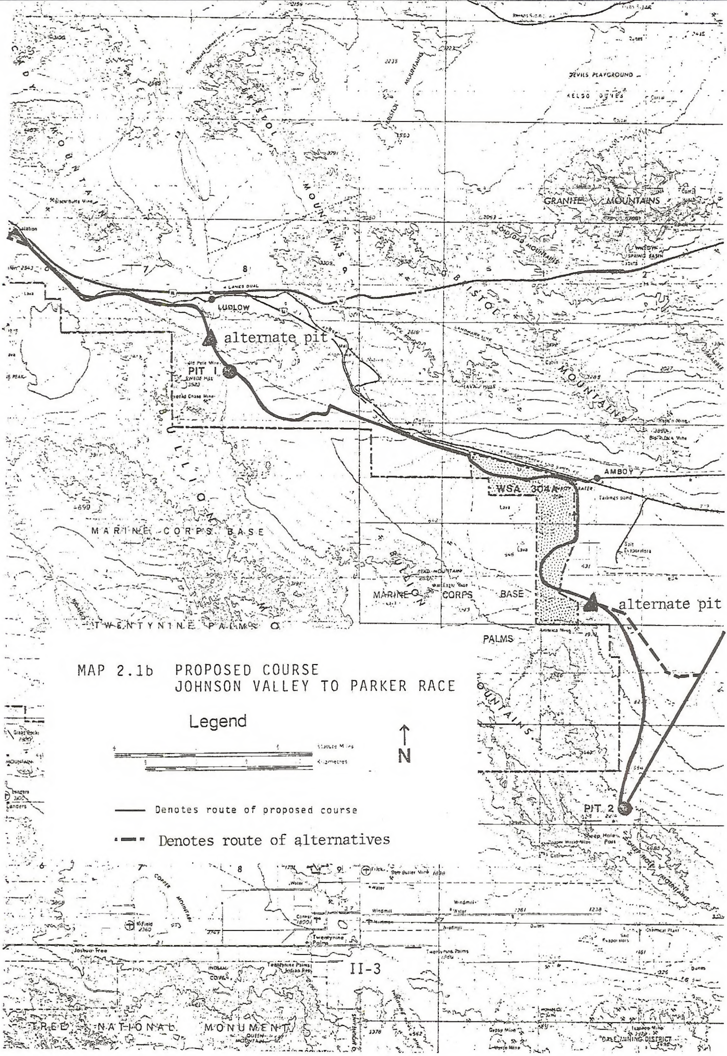
MAP 2.1a PROPOSED COURSE
JOHNSON VALLEY TO PARKER RACE

Legend

— Denotes route of proposed course

– – Denotes route of alternatives

■ DENOTES POINT WHERE PROPOSED COURSE BEGINS AFTER LEAVING JOHNSON VALLEY OPEN AREA. INSIDE JOHNSON VALLEY OPEN AREA COURSE IS SPONSOR OPTION.

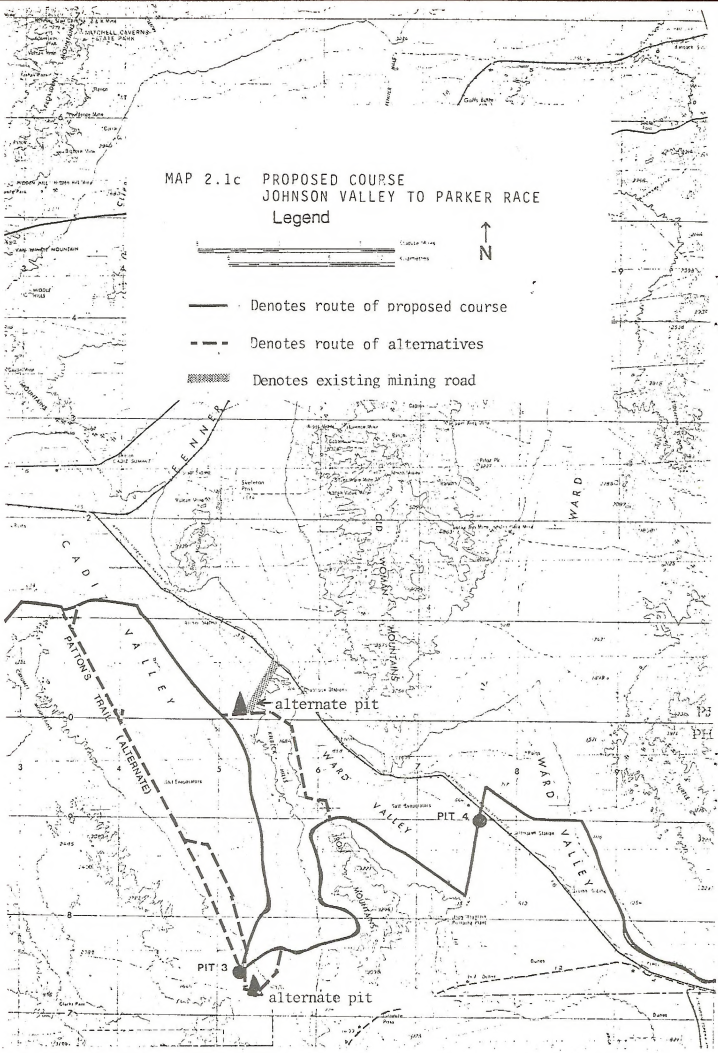


MAP 2.1b PROPOSED COURSE
JOHNSON VALLEY TO PARKER RACE

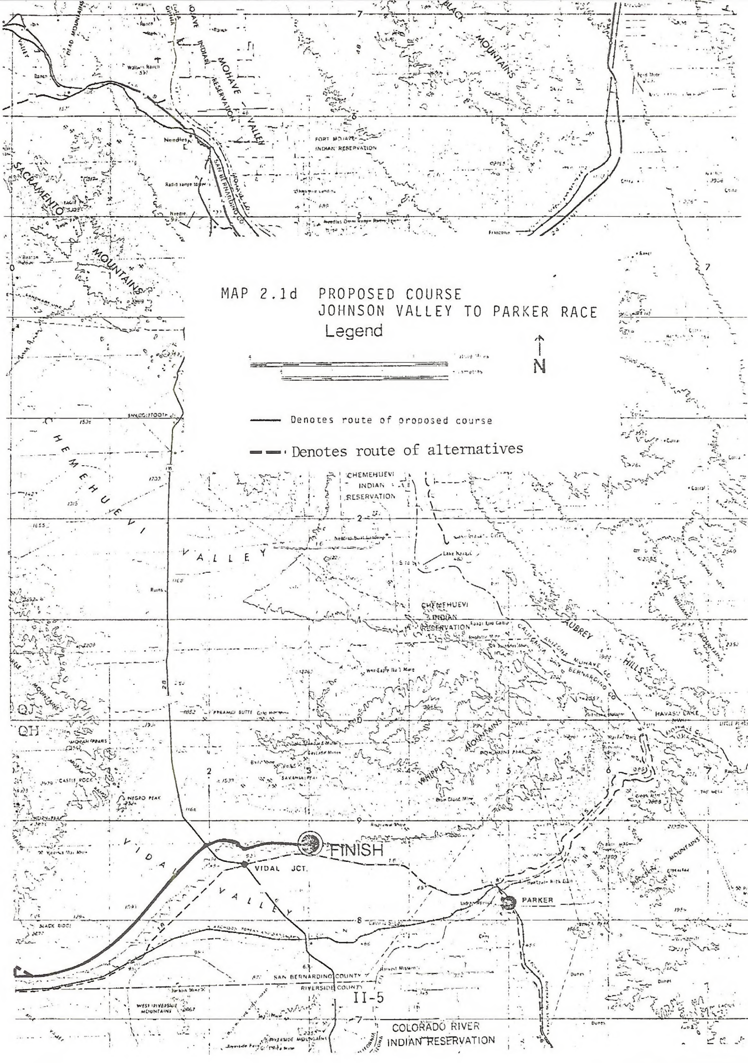
Legend

——— Denotes route of proposed course

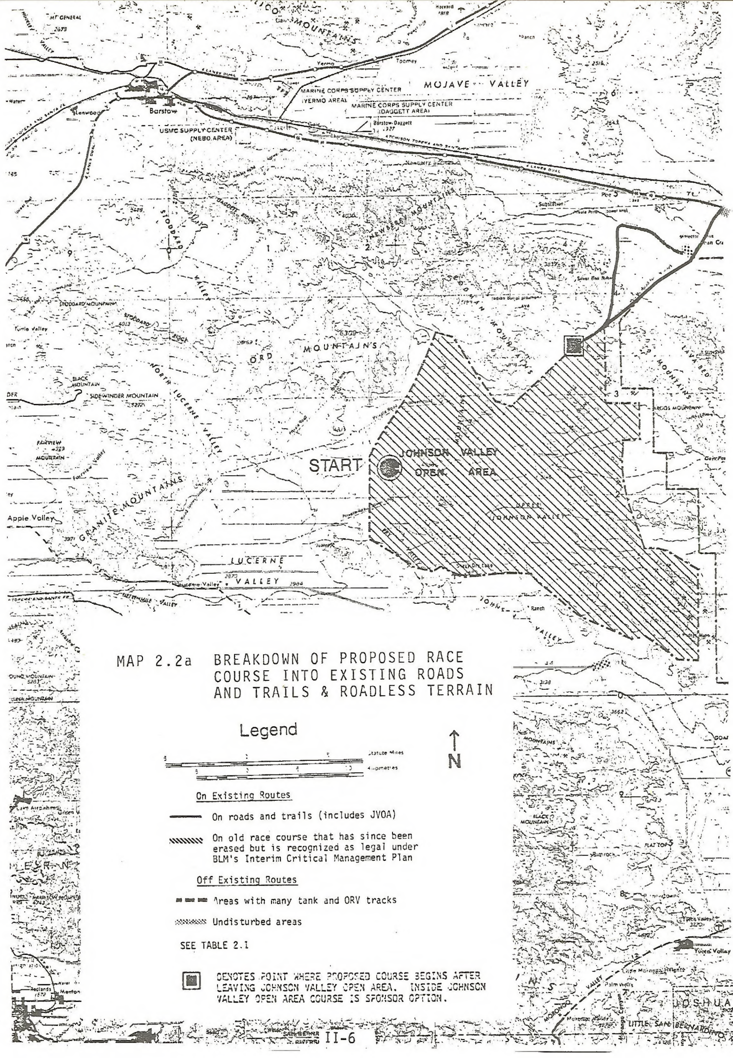
— — Denotes route of alternatives



MAP 2.1c PROPOSED COURSE
JOHNSON VALLEY TO PARKER RACE



MAP 2.1d PROPOSED COURSE
JOHNSON VALLEY TO PARKER RACE



MAP 2.2a BREAKDOWN OF PROPOSED RACE COURSE INTO EXISTING ROADS AND TRAILS & ROADLESS TERRAIN

Legend

On Existing Routes

— On roads and trails (includes JVOA)

▨ On old race course that has since been erased but is recognized as legal under BLM's Interim Critical Management Plan

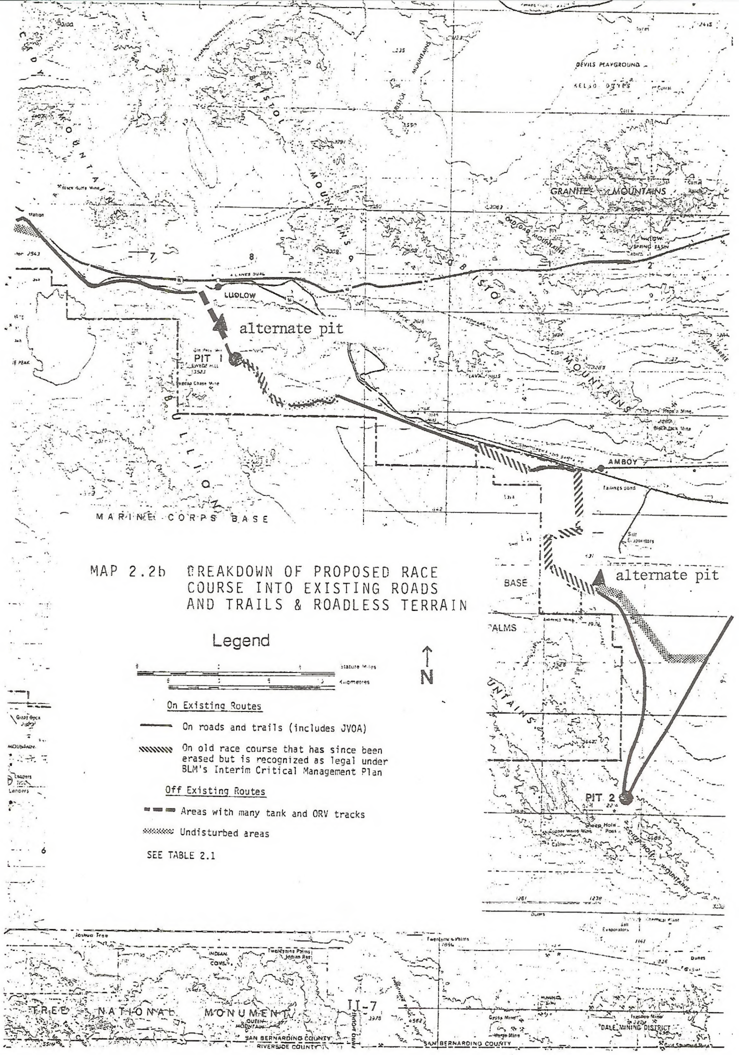
Off Existing Routes

▬ ▬ ▬ Areas with many tank and ORV tracks

▨ Undisturbed areas

SEE TABLE 2.1

■ DENOTES POINT WHERE PROPOSED COURSE BEGINS AFTER LEAVING JOHNSON VALLEY OPEN AREA. INSIDE JOHNSON VALLEY OPEN AREA COURSE IS SPONSOR OPTION.



MAP 2.2b BREAKDOWN OF PROPOSED RACE COURSE INTO EXISTING ROADS AND TRAILS & ROADLESS TERRAIN

Legend

Statute Miles

Kilometres

On Existing Routes

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Off Existing Routes

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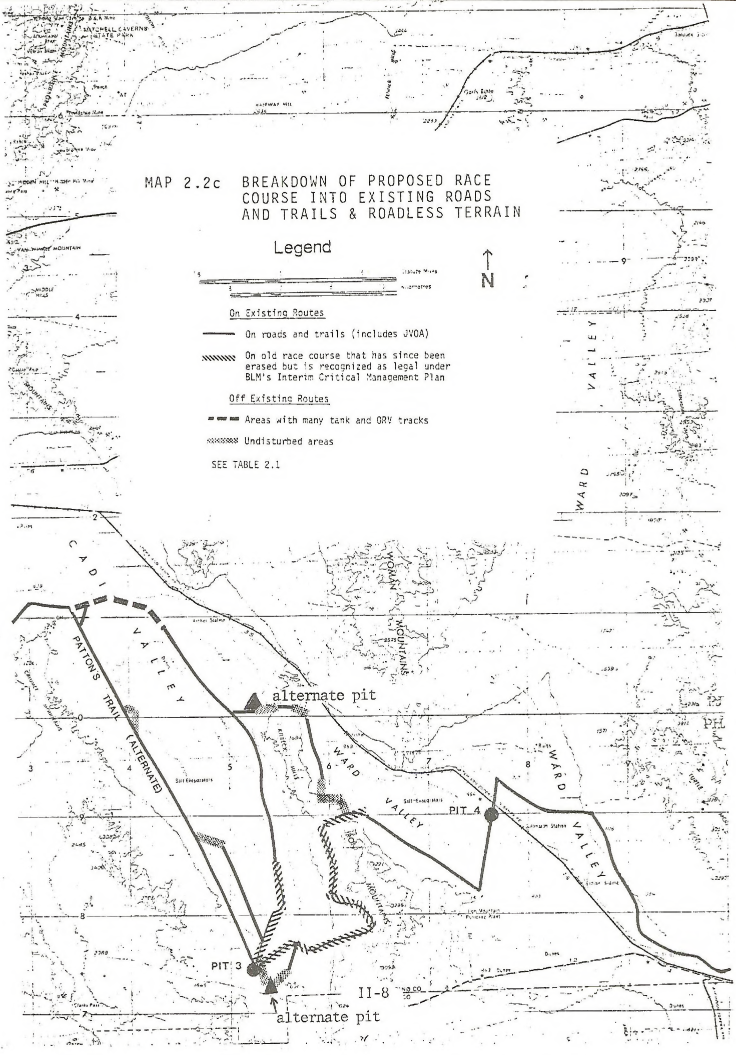

MAP 2.2c BREAKDOWN OF PROPOSED RACE COURSE INTO EXISTING ROADS AND TRAILS & ROADLESS TERRAIN

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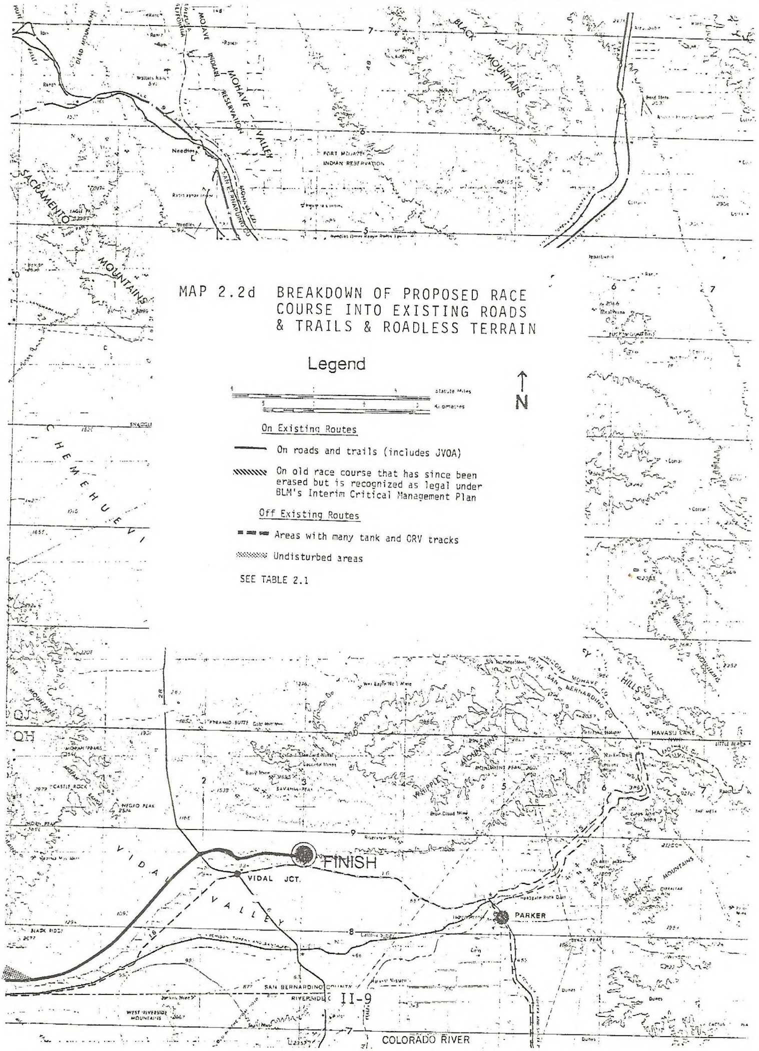


MAP 2.2d BREAKDOWN OF PROPOSED RACE COURSE INTO EXISTING ROADS & TRAILS & ROADLESS TERRAIN

A 200 foot-wide corridor (100 feet on either side of the course centerline) was surveyed for possible designation as a competive use corridor. The sponsor estimates that 90 percent of the course off obvious roads or trails will actually be less than 10 feet wide. Where roads are used, the course width will be restricted to the width of the road; otherwise the course width will be restricted as required to provide protection for identified sensitive areas.

In order to minimize environmental problems due to the two class starts proposed for this race, the course begins in the Johnson Valley Open Area (Anderson Dry Lake). The sponsoring club will determine the course route within the bounds of the Open Area, the only requirements being that this part of the course be long enough to allow the racers to funnel down to a narrow file and any identified sensitive resources be avoided. From the Johnson Valley Open Area, the course goes to the Pisgah Crater area then east toward Ludlow using various utility roads. Pit area 1 is located on Bagdad Road south of Ludlow, near Ragtown (site). The location of this pit has been moved approximately 2 miles to the north (See Public Comment Alternative). From here, a nine-mile segment proceeds east using old routes and braided washes before returning to utility roads. The course continues east toward Amboy Crater then south to Sheephole Pass making use of routes through 13 1/2 miles in Wilderness Study Area (WSA) 304 A and a telephone line road (to Sheephole Pass). Pit area 2 is located near Sheephole Pass on a privately-owned section of land. The proposed route then turns northeast and proceeds around the Calumet Mountains into Cadiz Valley on utility roads, looping around the northern end of Cadiz Dry Lake and along the east side of the Cadiz Dunes and on to pit area 3 located on Patton's Trail. Portions of this section of the course traverse the periphery of active sand dunes where any previously existing routes would have been covered by blowing sand. Much of the Cadiz Dunes will be recommended for closure in the forthcoming Proposed Plan for the California Desert. Therefore, this segment of the proposed course will no longer be considered. From pit 3 the course proceeds east through roadless terrain, once used for similar races, old tank and ORV tracks and washes around the western and northern portions of the Iron Mountains and along the western edge of Danby Dry Lake (on an old military road) to a pole line road.

This pole line road courses north through pit area 4 (between Cadiz Road and the AT&SF Railroad line) to the SCORE Parker 400 tie in, approximately two miles north of pit area 4. The course ends at the start/finish area of the SCORE Parker 400 race course.

Race Procedures

The proposed action is a point-to-point race having two class starts. The first will be for amateur and expert class riders; the second, leaving 15 or 20 minutes after the first, will be for beginner and novice class riders. The maximum number of participants will be 800.

In this kind of event, the riders line up shoulder-to-shoulder. When the starting signal is given, everyone begins riding toward a predetermined target such as a large flag or smoke bomb located one or two miles away. By the time the target area is reached, most of the riders are strung out more or less in single file. Once in single file, the riders spend the rest of the race attempting to pass each other as they jockey for better positions. Occasional bunching of riders is to be expected but the terrain and proper course marking will keep riders on course. Passing would be restricted to the surface of a road or the marked bounds of the course. Failure to comply would result in disqualification. At road crossings, all riders would be required to come to a full stop walk their bikes across when the way is clear and resume the race. Failure to do so would result in disqualification.

Riders in the beginner class will be required to stop the race at pit area 2. The first rider of that class to reach the pit will be declared the winner of that class. The other three classes will continue on as long as they are able, with the first finisher of each class being declared the winner of that class. The overall winner is the first to finish the race. It is expected that at pit 2 anywhere from 40 to 60 percent of the total number of entrants will still be riding. The number of riders who finish the entire race will probably be under 40 percent of those who started because of the long distance of the course and the challenge to both rider and machine.

There will be no pre-running of the race course. AMA rules require the disqualification of anyone attempting to pre-ride. The course will be marked adequately so that participants will have no problems following the course. To discourage course cutting or straying, the sponsor will set up checkpoints at unannounced locations. If a participant is not checked off at each point, he or she will be disqualified.

This is not a spectator event such as the SCORE Parker 400. Spectators will be allowed only at the start and finish areas of the race and must remain within the flagged areas provided. The sponsoring club will provide monitors to direct spectators. Only racers and their crews will be allowed in the four pitting areas. The sponsoring club will be responsible for removal of flagging and other debris within 10 days after the race. BLM and AMA rules require sanitary facilities at the start, finish and all pitting areas.

Course Marking

The most effective way to keep impact to a minimum and to insure the safety of the participants is to properly mark the course. AMA will do so following procedures developed from several years of desert racing experience and from guidelines set forth in this final EIS. The course marking will be done no more than 15 days prior to the scheduled event, such that all critical intersections, hazardous areas and sensitive areas will have been specifically identified. The markings will be inspected immediately before the race, and if necessary replaced. The BLM will communicate to the sponsor the locations of all sensitive areas where signs, barricades and/or monitors will be required.

When a road is followed, the course will be restricted to the width of the road (i.e. berm to berm). Orange and pink ribbon will be placed on either side of the road and spaced as necessary so that two flags can be seen ahead by the racers. Lime will be used to mark the centerline.

Where a course does not follow a road, it is flagged with orange and pink ribbon down the middle of the route, and limed. It will be in the self interest of the racers to stay on this centerline as much as possible; otherwise they run the risk of missing warning lines, turns or hazards unmarked and off the course. The maximum corridor width allowed off roads will be 50 feet. In most areas the actual area of disturbance will be less than 10 feet. In the draft EIS we stipulated a maximum width of 25 feet for cross-country areas and 15 feet for sensitive areas. The new allowances are more realistic and are necessary for the safety of the participants. Under certain conditions, for example, visibility is considerably impaired for a racer trailing someone who is raising dust, requiring him to move to one side for a clear view ahead.

In sensitive areas, whether on or off road, blue flagging will be spaced a minimum of every 1/10 mile on both sides of the course (See Map 2.3). To adequately mark the course centerline (which is the key to keeping the area of disturbance to a minimum), lime will be used approximately every 150 feet. The width will vary to a maximum of 50 feet and will be determined by the sensitivity and type of resource, soil type and safety concerns.

Turns will be marked by heavy flagging, lime stripes, and directional arrows on stakes. All road or railroad crossings and other hazardous areas will be marked by a combination of six limed lines, day-glo cards on three foot stakes, and arrows pointing downward; a flagman will be stationed at each crossing.

Safety Measures

The sponsor of the race will be required to provide for emergency medical service. Rescue 3 in Barstow (or some other service) will be contracted for and coordination made with BLM and CHP to provide the necessary equipment and services. Participants who encounter downed riders who are not being attended to, will be required to stop and render assistance. Failure to do so will result in disqualification. After the last class starts, the sponsoring club will "sweep" the course checking for injuries and breakdowns.

Insurance and Performance Bond

The BLM and affected permittees must be named in the applicant's insurance policy to protect against liability. In addition, the insurance policy should cover damage to existing man-made improvements resulting from the race.

A performance bond of $3,000.00 must be filed with BLM to insure adequate clean-up, maintenance and stabilization needed as a result of the race or actions of any support personnel.

Sponsor

The American Motorcycle Association (AMA), District 37 (Checkers Motorcycle Club) is the applicant, and will sponsor the race.

Permit and Notification Requirements

The sponsor will be required to obtain permits, file fees or provide notification as follows:

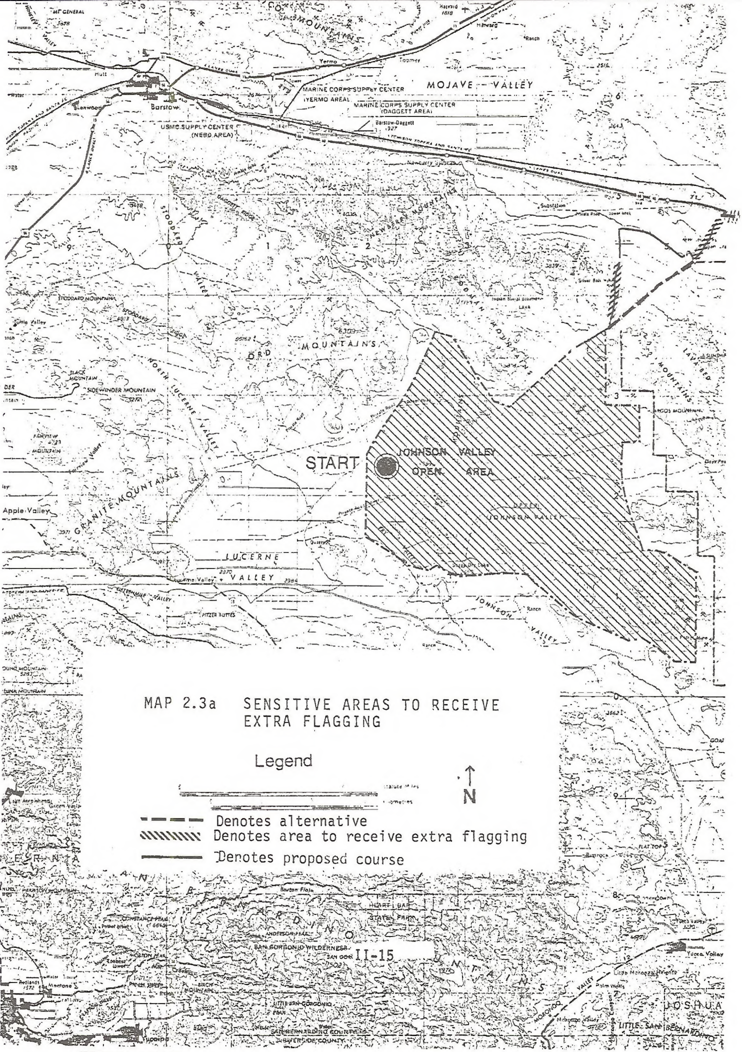
A. San Bernardino County
Permission to cross US 66, Amboy and Cadiz Roads; permission to cross private lands (if site approval is needed, there is a 120-day prior notification requirement). Water bars along the west side of Amboy Road are maintained by the County for flood control - their repair will be the responsibility of the sponsor.

B. California Department of Transportation (San Bernardino)
An enroachment permit is required for crossing U.S. 95.

C. California Highway Patrol (Blythe)
Coordination required for crossing public highways and setting up emergency procedures.

D. Nine rights-of-ways are used for the course, including telephone lines (PT&T), gas pipelines (PG&E), transmission lines (SCE), the AT&SF Railway and lands adjacent to the Colorado River Aqueduct. The sponsoring club will be required to notify each right-of-way holder at least 30 days before the race and will be required to restore roads or ways to their original condition to minimize interference.

E. Private Landowners
Permission to cross private lands will be obtained by the sponsoring club from each owner. If the private land is crossed by a right-of-way, the landowner will be notified. The majority of private lands affected by the race are owned by the Southern Pacific Land Company.



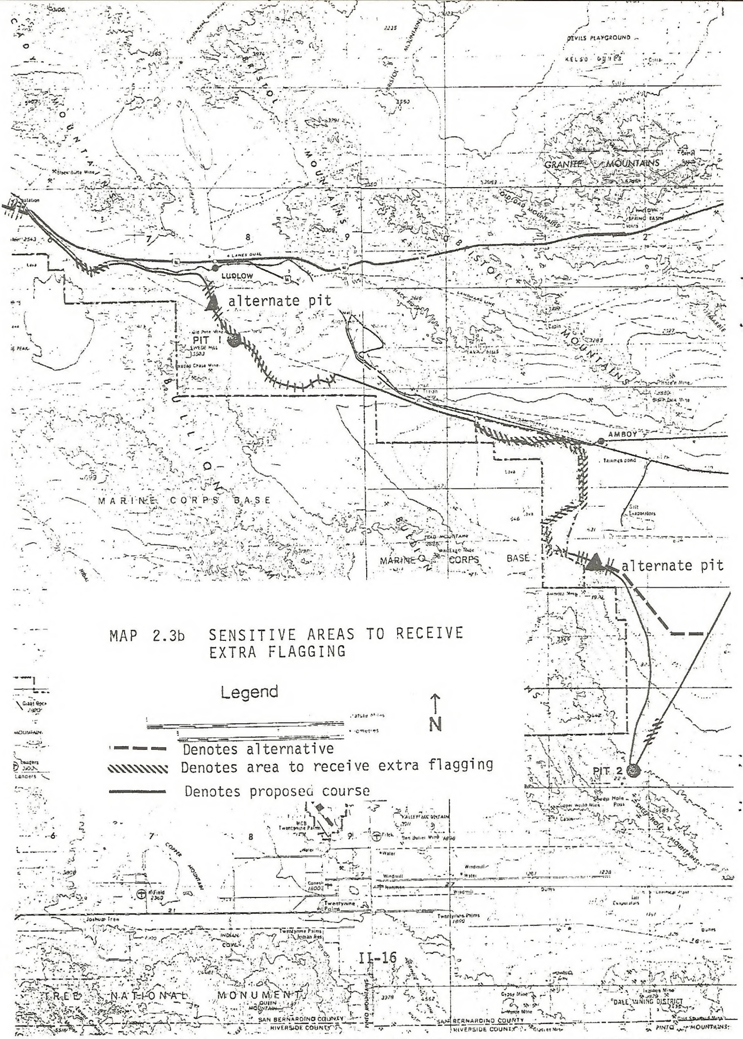
MAP 2.3a SENSITIVE AREAS TO RECEIVE EXTRA FLAGGING

Legend

- - - - Denotes alternative

▨ Denotes area to receive extra flagging

—— Denotes proposed course



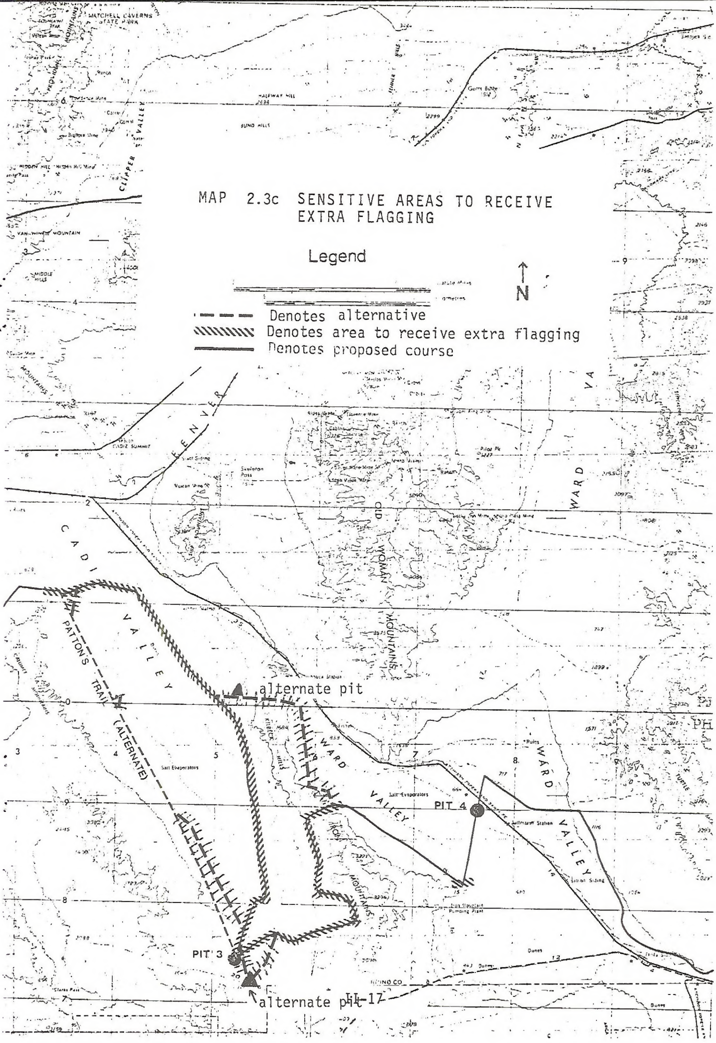
MAP 2.3b SENSITIVE AREAS TO RECEIVE EXTRA FLAGGING

Legend

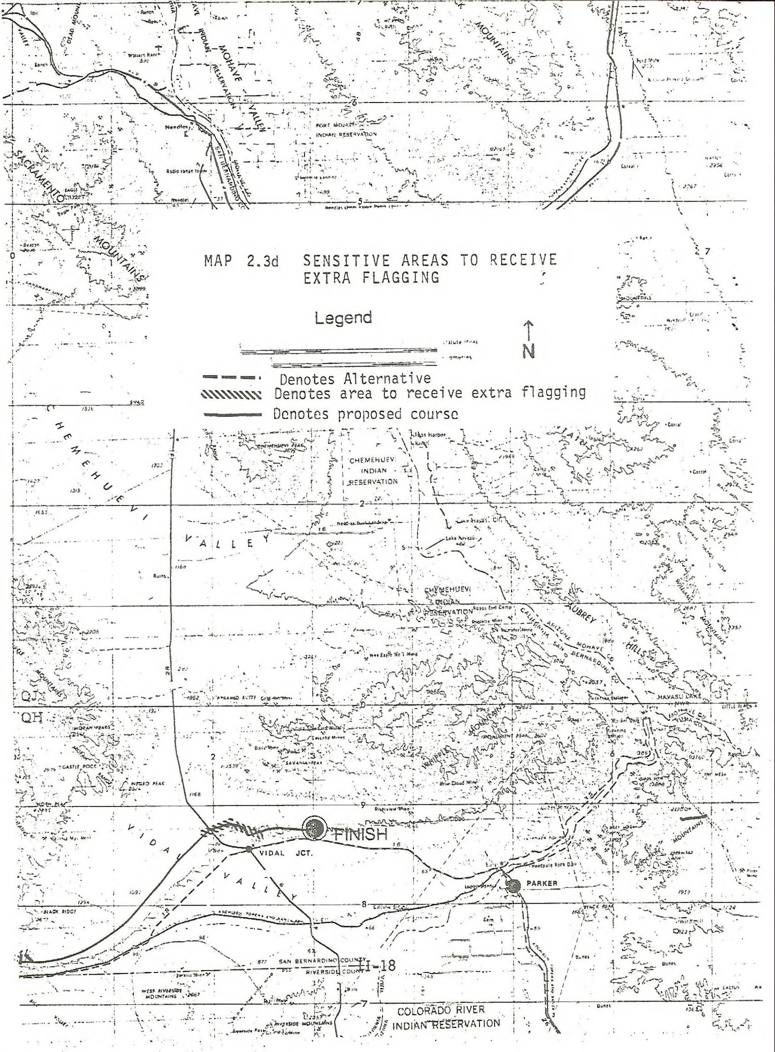
— — — Denotes alternative

▨▨▨ Denotes area to receive extra flagging

——— Denotes proposed course



MAP 2.3c SENSITIVE AREAS TO RECEIVE EXTRA FLAGGING



MAP 2.3d SENSITIVE AREAS TO RECEIVE EXTRA FLAGGING

F. Mining Access

Companies mining salt on Cadiz Dry Lake regularly maintain the southern 9 to 10 miles of Patton's Trail. Pit area 3 on the proposed course is located on the trail and access to the pit would be required on the day of the race. The Patton's Trail Alternative crosses the route of access but would make use of a pit 3 located away from Patton's Trail. The Savahia Corporation operates the Gold Queen Mine in the Turtle Mountains; 1.5 miles of their access road is used for the course.

The American Mine Corporation maintains an access road that is crossed by the proposed course and the Public Comment Alternative south of Bristol Dry Lake. To minimize conflicts, mine owners will be notified 30 days in advance of the race.

G. Military Ordnance

A number of bombs and other types of unexploded ordnance have been located in the past at the southern end of Cadiz Dry Lake. Responsibility for disposing of ordnance lies with the U.S. Marine Corps. Unexploded ordnance was found by BLM while the course was being laid out and has since been removed.

A complete list of parties affected by the proposed action is on file at the BLM's District Office, Riverside, California.

Monitoring Program

The BLM and AMA will take all reasonable steps to mitigate or avoid creating adverse impacts to resources. BLM is establishing a monitoring program to test the effectiveness of these measures and to determine what short and long-term effects are caused by motorcycle races on the final course. Resource surveys for the EIS were done so that baseline information could be established for each resource. After any race, an evaluation report will be prepared to document any changes that occur. Should the proposed action be permitted, the report would be perpared by the BLM and made available after spring-time wildlife and vegetation surveys are completed.

Air Quality

A visibility monitoring station consisting of of multi-wavelength, continuous output contrast telephotometers, a nephelometer, a complete set-up of meteorological gear, a fine particulate sampler and two automatic camera systems have been installed and will be situated so as to view part of the race course. The station will be gathering data before, during and after the race to provide not only the short but the long-term impacts of the event on visibility and air quality.

Soils

A contract from the California State Office (BLM) is to be let out early in fiscal year 1981 to monitor the effects of ORV events on soils in the California Desert Conservation Area. Should this event be permitted, monitoring stations along the course within various soil types will be established. The principle factors to be investigated would be soil compaction and erosion resulting from the proposed action.

Vegetation

One hundred twenty-five transects each consisting of five, one milacre (43.56 square feet) plots were established at approximately 1 1/4 mile spacing along the proposed course from the boundary of the Johnson Valley Open Area to the Parker 400 tie in. The transects were arranged on a line perpendicular to the proposed course. One plot was located on the centerline. Two more plots were placed 15 feet on either side of the course centerline and the remaining two plots were located 30 feet from the center of the course. For each plot all vascular plant species were recorded, individuals of each perennial species counted and total percent cover estimated.

These transects are designed to monitor impacts to vegetation on a year-to-year basis as a result of the proposed action. Information acquired from the vegetation inventory was used for the EIS as well as baseline information for yearly monitoring of impacts to vegetative resources along the proposed course.

Wildlife

Six permanent study plots, in representative,sensitive or important wildlife habitats were established along the proposed course. Each paired study plot consisted of a control and experimental plot. An experimental plot was located 5 meters from the course centerline and consisted of a one hectare small mammal trapping grid, a one-half hectare reptile trap grid, a two kilometer by 40 meter bird transect and a one kilometer by 10 meter reptile transect. The adjacent control plot was set up identically and located 50 meters from the proposed course centerline.

The study plots were designed to assess wildlife populations from quantitative and qualitative standpoints. Information acquired from the wildlife inventory was used for the EIS as well as for baseline information for yearly monitoring of changes in status of wildlife populations and/or habitat along the proposed course.

Cultural Resources

Control plots have been established at several points along the course to test for straying from the established course onto archeological sites and to provide data on types of impact, if any, that off-road vehicles have upon archeological resources. This will also serve to monitor the width actually disturbed by the event.

Wilderness

If it is determined that the continued use of a route through a wilderness study area will impair its suitability for wilderness designation, that portion of the course would be closed for future consideration. Determination of impairment or non-impairment will depend upon impact to other resources, such as soil compaction, disturbance to or destruction to archeological sites or adverse changes in habitat.

For all resources, impact significance criteria will be established. These criteria will be used to evaluate montoring data. Recommendations will be made on whether or not to modify or eliminate the event.

PATTON'S TRAIL ALTERNATIVE

This alternative is identical to the proposed action save a minor change in course alignment. At the northern end of Cadiz Valley, the proposed course proceeds southeast around the east side of Cadiz Dunes and continues south to pit area 3. The Patton's Alternative follows Patton's Trail south-southeast from the northern end of Cadiz Valley for 24 1/2 miles, turns east for two miles, then continues south on an old military route, known as Piccadilly Lane, for 8 miles to a relocated pit area 3. The new pit 3 would be on an old airstrip situated 1 1/2 miles southeast of its original location. The use of Picadilly Lane and the relocation of pit area 3 were made in response to comments received from mining interests on Cadiz Dry Lake. This alternative, therefore, avoids the Cadiz Dunes and reduces the distance of the course by approximately six miles. Eight to ten percent of the course would still be located in the Johnson Valley Open Area with 186 miles on existing roads and trails, 34 miles on old race courses which have since been obliterated and 11 miles of areas off existing routes (Table 2.2).

Table 2.2

Breakdown of Types of Surface Traversed
by the Patton's Trail Alternative

On Existing Routes	Percent	Miles
1. On roads and trails (includes (JVOA)	81	186
2. On old race course that has since been erased but is recognized as legal under BLM's Interim Critical Management Plan	15	34
Off Existing Routes		
3. Areas with many tank and ORV tracks	1	3
4. Undisturbed areas	3	8
TOTAL	100	231

PUBLIC COMMENT ALTERNATIVE

Based on comments received, the BLM is considering eight specific course realignments which collectivly comprice this alternative (Map 2.1). Five of these changes (1-5) were proposed by the Checkers Club of the AMA, District 37 and two (6 and 7) were proposed as a result of discussions with the Sierra Club. Change 8 is required because of a private land issue. The specific course realignments are:

(1) To avoid sensitive areas along a wash bordering WSA 207, AMA has proposed that the course follow SCE transmission line road from the Johnson Valley Open Area to US 66.

(2) To avoid safety problems with the crossing of US 66 twice, it has been proposed that the course leave the SCE transmission line road just before reaching US 66. The course would be rerouted 100 feet south of US 66 and run parallel to it for approximately two miles before joining the railroad maintenance road. This segment would go cross-country one section of private land.

(3) Pit 1, located south of Ludlow, has to be relocated because its present position would require that three miles of the course also be used for access by pitting vehicles. The pit has been moved to the intersection of Bagdad Road (running south from Ludlow) and the course. This relocation will apply to all three alternatives.

(4) & (5) The most important AMA proposed change would relocate the proposed course along the southern periphery of Bristol Dry Lake. The proposed course follows a telephone line road along Amboy Road to pit 2, located at Sheephole Pass. San Bernardino County maintains a series of flood control water bars along this stretch of Amboy Road. There is a chance that some riders would ride on Amboy Road because of its proximity (approximately 75 feet) and to avoid the water bars. The cost of restoring the bars would be quite expensive. AMA's proposal is to relocate pit 2 along a road used by the course and located at the southern end of Bristol Dry Lake. The course would then be rerouted to cross Amboy Road at the pitting area and continue along the southern periphery of the dry lake until the proposed course is reached.

(6) & (7) The Sierra Club has suggested that the proposed course be changed to avoid the sand dune habitat in the south end of Cadiz Valley which they feel is too sensitive for this type of use. This was also brought out in the draft EIS. A mining road along the northern edge of the Kilbeck Hills would be used for access to pit 3, which would be relocated on the mining road. The course would then go through the Kilbeck Hills, primarily through dry washes, and connect with the proposed course at the northern end of Iron Mountains. This change and the (revised) Patton's Tail Alternative both avoid conflict with the Proposed Plan for the California Desert to be made public by the end of September 1980. Much of the Cadiz Dunes will be recommended for closure to motorized vechicles in the Desert Plan.

(8) A very small change in the Parker 400 segment of the proposed course is necessary to avoid private land whose owner does not want the course to cross his property. The relocated course will border WSA 307.

This alternative, as well as the Patton's Trail Alternative, avoids the sensitive Cadiz Dunes and reduces the total length of the course by 40 miles. Eight to ten percent of the course would still be located in the Johnson Valley Open Area with 135 miles on existing roads and trails, 21 miles on old race courses which have since been obliterated and 39 miles in areas off existing routes (Table 2.3)

Table 2.3

Breakdown of Alternate Course into Existing Roads and Trails and Roadless Terrain

On Existing Routes	Percent	Miles
1. On roads and trails (includes (JVOA)	69	135
2. On old race course that has since been erased but is recognized as legal under BLM's Interim Critical Management Plan	11	21
Off Existing Routes		
3. Areas with many tank and ORV tracks	5	10
4. Undisturbed areas	15	29
TOTAL	100	195

NO RACE ALTERNATIVE (NO ACTION)

There are three proposed course alternatives, any combination of which might be selected for a final, approvd course. The only other alternative is not to authorize a point-to-point competitive motorcycle race. The area in question would continue to be managed according to the principles of multiple use and sustained yield.

Alternatives Identified but Not Considered

The 1979 Check Chase Environmental Assessment Report's proposed course is very similar to the proposed course in this EIS, making separate consideration of the two pointless. A compromise course was developed from a series of facilitation meetings last fall, but was rejected by the sponsoring club because of its lack of racer appeal and safety problems (nearly every mile of the compromise course was on high-speed roads). This course was not considered as an alternative in this year's EIS because of the problems that led to its rejection.

Before we had determined what the proposed course would be for this EIS, it was our hope to avoid wilderness study areas entirely. One way to avoid WSA 304 A would be to cross US 66 twice and travel across the top of the area. Unfortunately no suitable place was found for the highway crossing that would be safe and require no ramps (the highway is raised above the surface in this area). Another possibility was to route the course south of the WSA through the Twentynine Palm Marine Corps Base. Because of military commitments of Base personnel and problems with the location and disposal of live ordnance, it was not feasible to propose this alternative this year. Some concern was also expressed that permission to cross the Base could be revoked at any time.

Other course routes were looked at but could not be given more then token consideration because of conflicts with the draft and proposed California Desert Plan, excessive violation of the ICMP and the issue of wilderness study area impairment

MITIGATING MEASURES

Many standard mitigating measures and stipulations are included in the permit system and are discussed above. The following mitigation measures will be carried out should the proposed action, Patton's Trail Alternative, or public comment alternative be implemented.

1. If the ground is noticeably wet (from previous precipitation), the race will be postponed until the ground dries to prevent unnecessary soil compaction and disturbance.
2. Concern has been expressd for creosote rings found in Johnson and Cadiz Valleys. Small were found near the proposed course, and will be protected by flagging. The rings in Johnson Valley are far from the proposed start at Anderson Dry Lake. Areas with sensitive species of plants or important botanical resources will be protected by flagging or temporary barriers.
3. Significant habitats are those relatively uncommon or important, such as sand dunes, or that support unusually rich assemblages of animals and plants. Such habitats have been identified along the course and will be flagged accordingly. The race sponsor will discourage participants and support crews from collecting or disturbing wildlife or cultural resources.
4. The permittee will assure that all race vehicles and support vehicles remain on the approved course or use public highways.
5. The permittee will assume responsibility for restoration to the satisfaction of the BLM's authorizing officer of any lands requiring soil, vegetative or other environmental stabilization as a result of the event.
6. Where specific portions of the course are identified as in need of grading, such activity will take place only when directed by the BLM's authorizing officer. It will be accomplished under close supervision from BLM personnel in an effort to ensure maximum resource protection while (1) ensuring that commonly used roads remain in either the same general condition as before the race or passable to uses occurring before the race, (2) making every reasonable effort to hold course widening and deviation to a minimum and (3) not creating conditions which encourage increased use in sensitive areas.

7. Site-specific mitigation for potential National Register (cultural resource) Properties:

   A. Vidal Junction: This portion of the course is routed on an existing road which is presently used to access Gold King and Silver Queen Mine. Efforts to relocate the course were abandoned after the extensiveness of the district was realized and when it was decided that relocation would only result in new surface disturbance. Therefore, along both sides of the existing road which passes through the archaeological district, barriers and fences shall be erected at critical points (and subject to safety considerations) to deter which will deter participants and spectators from entering the district. During the race, five monitors will be stationed at the district and air patrol of the district shall be made to determine the effectiveness of the fence in detering off-road vehicle passage into the distict. If it is found that the fence is ineffective, a recovery/preservation program shall be implemented at the district. The program shall include formulation of a research design which shall be approved by the State Historic Preservation Officer and the Advisory Council on Historic Preservation. The program shall include recordation, mapping and sample collection of the archaeological resources.

   B. Lavic Archaeological District: Anticipated impacts on this district are mitigated by routing the race course on an existing railroad maintenance road. The portion of the district on the north side of the route is already buffered (protected) by the railroad grade, however, further measures shall be implemented to protect cultural resources on the south side of the road, including monitoring and fencing. Monitors shall be stationed in this district along the race to deter unauthorized short-cuts, and identified violators will be disqualified. In the event that monitoring and fencing is ineffective in detering participants or others from entering the district, a lithics specialist shall be contracted.

8. The permittee will agree to indemnify and hold the United States, its officers, agents and employees harmless against any expenses for personal injury, death or property damage arising out of the permittee's operation under this permit.
9. This race must comply with all other Federal, State, and County laws which govern events of this type.

Relationship of the Proposed Action and Alternatives to the California Desert Plan and the Interim Critical Management Plan

This proposed action and alternatives will be fully consistent with the Proposed Plan for the California Desert Conservation Area, which will be released October 1, 1980. Although the plan deals with the entire CDCA, this EIS, which addresses a point-to-point organized event proposal on a site-specific basis, is consistent with the multiple use class guidelines in the Plan. The conclusions of this process and monitoring will be incorporated into the Final Plan for the CDCA for consideration of possible future events or uses of this particular route.

We are considering this event at this time since the sponsor's proposed date is prior to adoption of the Final Plan. For this reason, BLM is entering into this separate but consistent EIS effort.

The Interim Critical Management Plan (ICMP) for Vehicle Use in the California Desert (1973) will be in effect until the Proposed Plan for the California Desert is approved.

Section 4, page 1, paragraph c of the Environmental Analysis Record for the I.C.M.P. provides specific guidance for competitive events. This guidance is shown below:

c. Competitive Event Provisions. The program has made special provisions for vehicular competitive events under a number of management controls.

Nineteen areas are identified in which a system of race courses will be planned to accommodate the various types of competitive events traditionally held throughout the desert. These include cross-country, hare & hound, hare scrambles, european scrambles, poker runs and 4x4 loops. Two additional competitive events will be permitted on courses to be selected and planned by the sponsors of such events. Supplemental environmental analysis will be required for completion of a system of courses as well as for the approval of the courses proposed by sponsors. Procedures for issuing Special Land Use Permits on such courses for such events have been established and will continue as a part of this program.

The routes considered in this EIS conform to the general routes considered for point to point competitive events for the subject area in the I.C.M.P. This EIS constitutes the supplemental analysis required by the I.C.M.P. to accomodate a competitive event. A Special Recreation Use Permit may then by issued permitting the event.

IMPACT SUMMARY

Impacts on environmental resources would be relatively minimal on 178 miles of the 235 miles of the proposed course, 186 miles of the 231 miles of the Patton's Trail Alternative and 135 miles of the 195 mile long course under the Public Comment Alternative. The remaining portions of the proposed course and alternatives would sustain moderate to heavy levels of impacts depending upon the nature of the environment, existing impacts, and degree of environmental sensitivity. Table 2.4 analyzes the estimated surface disturbance between the proposed action and alternatives and Table 2.5 summmarizes the impacts of the proposed action and alternatives.

Table 2.4

Comparative Analysis of Estimated Surface Disturbance Between Proposed Action and Alternatives

		Proposed Action	Patton's Trail Alternative	Public Comment Alternative
	Miles not on obvious roads or trails	57	45	60
Estimated Acres of Disturbed Surface*	Assuming a 10 foot corridor	69	55	73
	Assuming a 15 foot corridor	104	82	109
	Assuming a 20 foot corridor	138	109	145
	Percent of total length off existing roads and trails	24	19	31

*Surface disturbance is assumed for all portions of a course not on obvious road and trails.

Table 2.5

Comparative Analysis of Impacts of the Proposed Action and Alternatives

RESOURCE	PROPOSED ACTION	PATTON'S TRAIL ALTERNATIVE	PUBLIC COMMENT ALTERNATIVE	NO RACE
AIR QUALITY	Creation of dust above normal levels and in excess of 24 hour TSP standard.	Same as for proposed action	Same as for proposed action.	No additional levels of dust generated above normal levels.
SOILS	Increased soil compaction and loss of topsoils along course. Severe compaction in pit and start/finish area. Minor increases in erosion.	No soil disturbance in Cadiz Dunes.	No soil disturbance in Cadiz Dunes or west side of Iron Mointains. Disturbance through Kilbeck Hills.	No additional compaction, loss of topsoils or erosion
VEGETATION	Destruction of vegetation and reduction plant density, diversity and biomass along roadless portions of course. Possible impact on listed species.	Avoidance of Cadiz Dunes. No impact on two listed species.	Same as Patton's Trail Alternative. Disturbance to raptors in Kilbeck Hills.	No additional losses to vegetative resources other than existing impacts.
WILDLIFE	Quantitative and qualitative losses to habitat and decreased productivity in wildlife populations primarily along roadless portions of course. Impact on sensitive and significant species as well as important habitats.	Avoidance of most important habitat, one sensitive species and endemic invertebrates in Cadiz Dunes.	Same as Patton's Trail Alternative. Disturbance to raptors in Kilbeck Hills.	No additional losses of wildlife resources above and beyond existing situation.
CULTURAL RESOURCES	Damage, destruction, displacement and/or illegal collection of archaeological sites. Forced mitigation of sites. . .	Same as proposed action save nine sites and isolated finds in Cadiz Dunes.	Same as Patton's Trail Alternative.	No additional impacts on cultural resources

NATIVE AMERICAN CONCERNS	Conflict with desires and wishes of Native Americans. No additional impact other than those identified to other resources.	Same as proposed action.	Same as for proposed action.	No additional impacts beyond existing situation.
VISUAL RESOURCES	Brief creation of dust Minor modification of surfacr features.	No dust or modification of surface features in Cadiz Dunes.	Brief creation of dust and minor modification of surface features through Kilbeck Hills, but not in Cadiz Dunes.	No additional dust or modification of surface features beyond existing situation.
WILDERNESS	Further but relatively minor disturbance to WSA 304 A.	Same as proposed action.	Same as for proposed action.	No further disturbance to WSA 304 A.
RECREATION	Short-term and minor impact on non-vehicular oriented recreation. 5000+ VUD's of vehicular oriented recreation.	Same as proposed action.	Same as for proposed action.	No additional impact to non-vehicular oriented recreation. Loss of 5000+ potential VUD's of vehicular oriented recreation.
SOCIAL AND ECONOMIC FACTORS	Expenditures of about $100,000 in Parker, AZ. Temporary disruption of Parker's usually quiet atmosphere.	Same as proposed action.	Same as proposed action.	No additional spending in Parker resulting from proposed action. No distruption of Parker's atmosphere resulting from proposed action.

Chapter III

Affected Environment

AFFECTED ENVIRONMENT

The area affected by the proposed action is in the southern Mojave Desert of southeastern San Bernardino County, California, and is part of the California Desert Conservation Area. This area is characterized by low precipitation, high summer temperatures, generally sandy soils and relatively sparse vegetation. The area is generally flat to gently sloping except where interspersed by small, but rugged mountain ranges.

The southern Mojave is characterized by a relative abundance of dirt roads, many of which are utility (transmission line, telephone line, gas pipeline, etc.) maintenance roads. Only a few paved roads traverse the area. One railroad (Santa Fe) running from Los Angeles through Needles, passes through the subject area. Only a few small towns, primarily along the railroad, dot the area.

Other human-related intrusions of the area include mining, some (proposed) ephemeral grazing and recreation, primarily off-road vehicle oriented.

CLIMATE AND AIR QUALITY

The location of the proposed action is within an arid region and by definition, the potential for water evaporation in such regions greatly exceeds precipitation.

Temperature and precipitation data from stations in proximity to the proposed race course are presented in Tables 3.1 and 3.2 (Department of Commerce, 1978) respectively. Average annual temperatures range from 64.2° F at Barstow to 73.8° F at Parker Reservoir.

Average annual precipitation at the four stations ranges from 2.93 inches at Iron Mountain to 4.35 inches at Parker Reservoir.

Wind speed and direction are important factors affecting the dispersion of dust and other air pollutants. Wind data from a station at Rice, near the proposed race course, is presented in Table 3.3 to illustrate the range of wind speed and direction which may be expected (California Department of Water Resources, 1978).

TABLE 3.1

AVERAGE MONTHLY TEMPERATURES

Station	Average Monthly Temperatures, ^{o} F (rounded)												Mean
(Year of Record)	J	F	M	A	M	J	J	A	S	O	N	D	
Barstow (1952)	46	50	55	62	70	78	85	83	77	66	54	46	64.2
Daggett Airport (1931)	47	52	57	64	72	80	87	86	79	68	56	48	66.4
Iron Mountain (1940)	53	58	63	71	80	88	95	93	87	75	63	54	73.2
Parker Reservoir (1941)	53	58	63	72	80	88	95	94	88	77	63	54	73.8

TABLE 3.2

AVERAGE MONTHLY PRECIPITATION

Station	Average Monthly Precipitation (inches/100)												Mean
(Year of Record)	J	F	M	A	M	J	J	A	S	O	N	D	
Barstow (1962)	63	49	52	24	04	04	32	30	24	26	48	57	4.13"
Daggett Airport (1935)	51	36	39	27	05	03	27	57	32	28	35	48	3.88"
Iron Mountain (1940)	48	20	26	17	02	00	25	42	18	35	22	38	2.93"
Parker Reservoir (1941)	55	40	57	28	04	02	30	53	39	30	42	55	4.35"

TABLE 3.3

PERCENTAGE FREQUENCY OF WIND DIRECTION AND SPEED OF SURFACE WINDS

Rice, California, June 1943 - March 1944 (hourly observations)

	Speed (mph)							
Direction	1-3	4-12	13-24	25-31	32-46	47+	Percent	Mean
N	0.5	2.3	0.6	0.1	0.0		3.6	9.0
NNE	0.1	0.9	0.3	0.1			1.4	10.1
NE	1.0	6.6	1.5	0.0			9.1	8.2
ENE	0.2	1.6	0.3				2.1	7.6
E	1.2	6.5	0.3	0.1				5.9
ESE	0.4	1.6	0.4					7.8
SE	0.7	6.2	0.5					6.9
SSE	0.1	1.7	0.7					10.0
S	0.8	5.0	0.9	0.0				7.8
SSW	0.2	1.6	0.4					8.3
SW	0.7	5.0	0.6	0.1				7.3
WSW	0.1	1.9	0.1	0.1				7.4
W	1.1	10.8	1.0	0.0				7.4
WNW	0.4	6.4	1.2					9.1
NW	0.9	16.3	5.4	0.2	0.0			10.1
NNW	0.1	1.0	0.6	0.1				11.8
Calm	---	----	----	---	---		0.2	8.3
0.2	8.5	75.6	14.9	0.8	0.0		100.0	

Table 3.4: Suspended Particles measured at Desert Locations.

	Total Suspended Particulate Matter (Micrograms per cubic meter)		
Station	1971	1972	1973
Barstow	74	75	104
Lucerne Valley	85	85	75
Needles	49	N/A	N/A
Twenty-nine Palms	--	N/A	40
Victorville	89	102	119

Air quality in the California Desert is affected by constituents of both natural and anthropogenic origin from both within and outside of the desert region. Annual geometric means of total suspended particulate matter from several desert monitoring stations are presented in Table 3.4 (San Bernardino County, 1974).

SOILS

The only report on soils which covers the entire route is that done by the River Basin Study Group (1968). This soil survey is a very general estimate of soil associations. The Report and General Soil Map of the Southwestern desert area (Porter, 1970) is a more detailed soil survey which covers the race course near the start. The most detailed soil coverage along the course is provided by the Order 3 Soil Survey of the Turtle Mountain Area (Earth Environmental Consultants, Inc., 1978) near the finish. The entire course is also covered by a report on landforms of the California Desert (Brenner, 1978). To provide information about soils along the race course, estimates were made from the map of the River Basin Study Group (Table 3.5) and the map of landforms of the California Desert (Table 3.6). The landform map was used since it provided more detail than the general soil map, because many of the landforms shown can be related to soil properties discussed in the soil surveys and because many properties of the landforms are those of concern in interpreting impacts.

About 57 miles of the course is off roads and trails. Field observation, landform maps, and soil servey maps indicate that about 9 miles of this total will be predominantly on cohesionless sand (sand dunes, sand sheets or washes). Most of the remaining 48 miles which are not on roads will be on soils with cohesive sand or finer surface textures.

TABLE 3.5

SOIL ASSOCIATIONS

Proposed Course:

Soil Association	Surface Soil	Percent Coverage	Miles
Carrizo-Riverwash	gravelly sand to sand	37	87
Anthony-Cajon Arrizo	sandy loam to gravelly sand	19	45
Aco-Acolita-Rositas	sandy loam to sand	12	28
Granite-Rockland	soil mostly shallow to none, 40 to 90% rock out crops	12	28
Chuckwalla-Orita Rough broken land	gravelly silt loam to loamy sand. Some areas with desert pavement	8	19
Daggett-Tonopah-Bitterspring	gravelly sandy loam to sand	6	14
Lava Rockland	Soil often very shallow to none. 40 to 90% volcanic out crops	3	7
Thermal Playas	Textures usually moderately fine to fine	3	7
	Total	100	235

Patton's Trail alternative segment:

Soil Association	Surface Soil	Percent Coverage	Miles
Carrizo-Riverwash	gravelly sand to sand	77	20
Aco-Acolita-Rositas	sand loam to sand	23	6
	Total	100	26

Public Comment Alternative Segments:

Soil Association	Surface Soil	Percent Coverage	Miles
Carrizo-Riverwash	gravelly sand to sand	53	21
Anthony-Cajon Arrizo	sandy loam to gravelly sand	12	5
Aco-Acolita-Rositas	sandy loam to sand	18	7
Granite-Rockland	soil mostly shallow to none, 40 to 90% rock out crops	12	5
Thermal Playas	Textures usually moderately fine to fine	5	2
	Total	100	40

TABLE 3.6
LANDFORMS

Proposed Course:

Landform		Percent Coverage	Miles
Undifferentiated alluvial fan		37	86
Sand covered fan		19	44
dissected fan		11	27
hill		6	15
lava flows		5	12
sand dunes		4	10
sand covered plains		4	10
mountains		3	7
sand covered dissected fans		2	5
longitudinal dunes		2	5
plains		1	2
riverwashes		3	6
pediments		1	2
dry playas		1	2
highly dissected fans		1	2
	Total	100	235

Patton's Trail alternative segment:

Landform		Percent Coverage	Miles
Sand covered fans		77	20
Sand covered plains		23	6
	Total	100	26

Public Comment alternative segments:

Landform		Percent Coverage	Miles
Undifferentiated alluvial fan		15	6
Sand covered fan		35	14
dissected fan		3	1
Plains		27	11
riverwashes		17	7
pediments		3	1
	Total	100	40

About 9 miles of the off-road course which crosses cohesive soil is in areas with many tank tracks. Approximately 6 miles of the off-road course is estimated to cover undisturbed areas of primarily cohesive soils. About 42 miles of off-road course are estimated to be along a previous race course. Of these 42 miles approximately 6 miles are on soils dominated by cohesionless sands (mostly dunes and washes) and the remaining 36 miles are mostly on cohesive surface soils.

The Patton's Trail alternative is generally very sandy and is on existing roads.

The presence of the Valley fever pathogen (Coccidioides immitis) was confirmed at a site in Johnson Valley near the proposed starting point of the race (Leathers, 1978). In the same study samples taken from near the Parker "400" course did not show the presence of Coccidioides immitis. The absence of the pathogen in a small number of samples, however, does not mean that it does not occur in the general area.

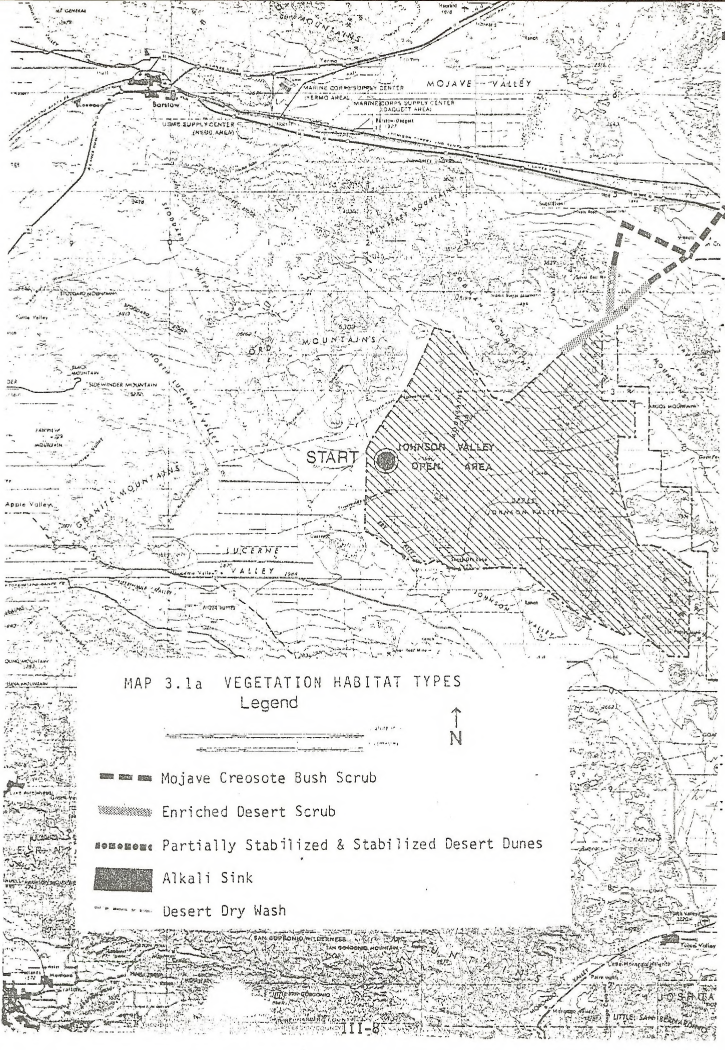
The public comment alternative passes through five soil associations and six different land forms (Tables 3.5 and 3.6). No new mapped soil associations or land forms, other than those previously assessed for the proposed action, are encountered.

VEGETATION

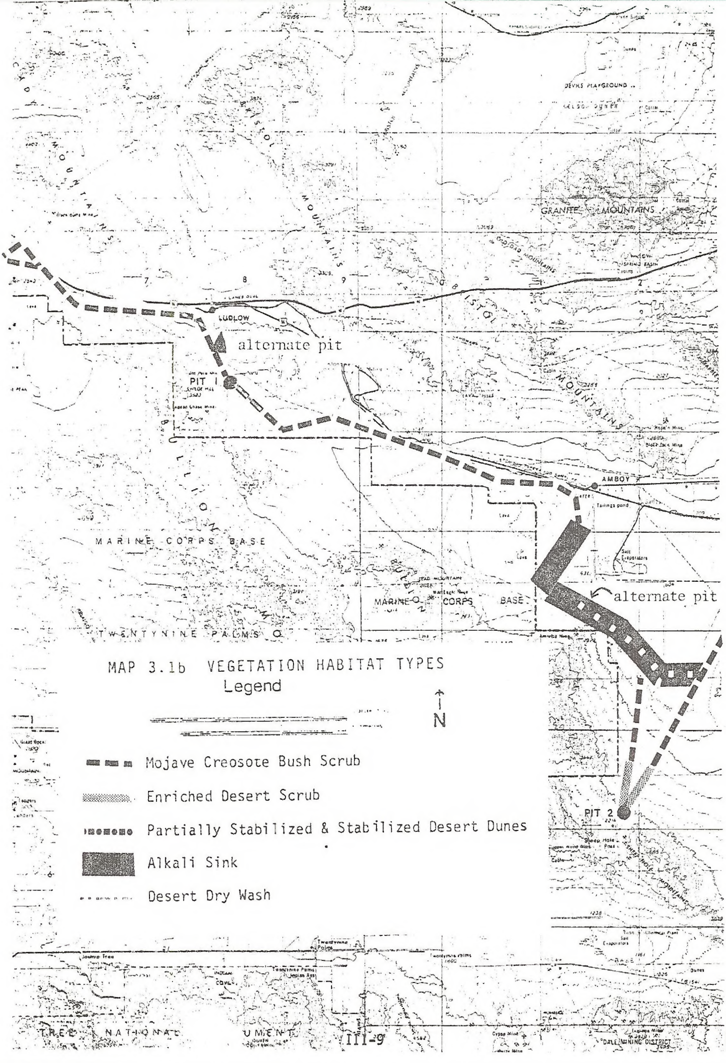
Methodology

A system of experimental plots was established to study vegetation along the proposed Johnson Valley to Parker motorcycle race course. These experimental plots are spaced at approximately 2 km (1.25 miles) intervals along the section of course described as the vegetative study area. The vegetative study area starts where the course leaves the Upper Johnson Valley Open Area, and follows the proposed course and alternatives up to the tie-in with the Parker 400 course (Map 3.1).

The experimental plots consist of five individual circular plots of a milacre (4.84 sq. yds., radius 44.7 in.) each. These plots are arranged on a line perpendicular to the race course. The center of one plot was placed in the center of the race course, two plots had their centers placed 15 feet on either side of the center, and the centers of the last two plots



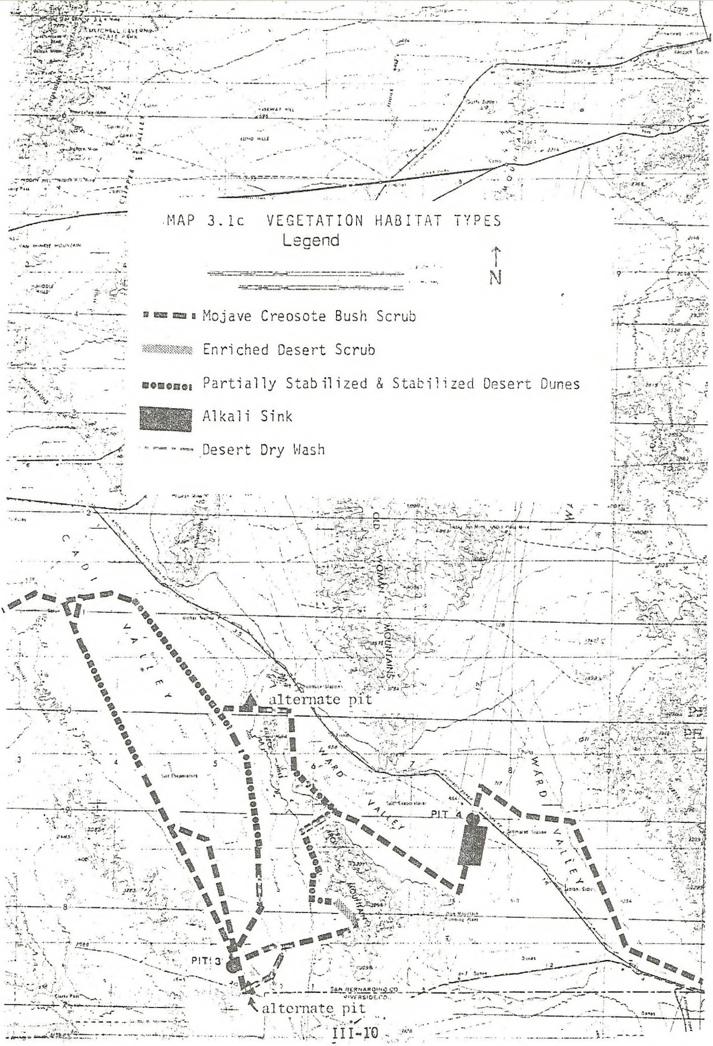
MAP 3.1a VEGETATION HABITAT TYPES



MAP 3.1b VEGETATION HABITAT TYPES

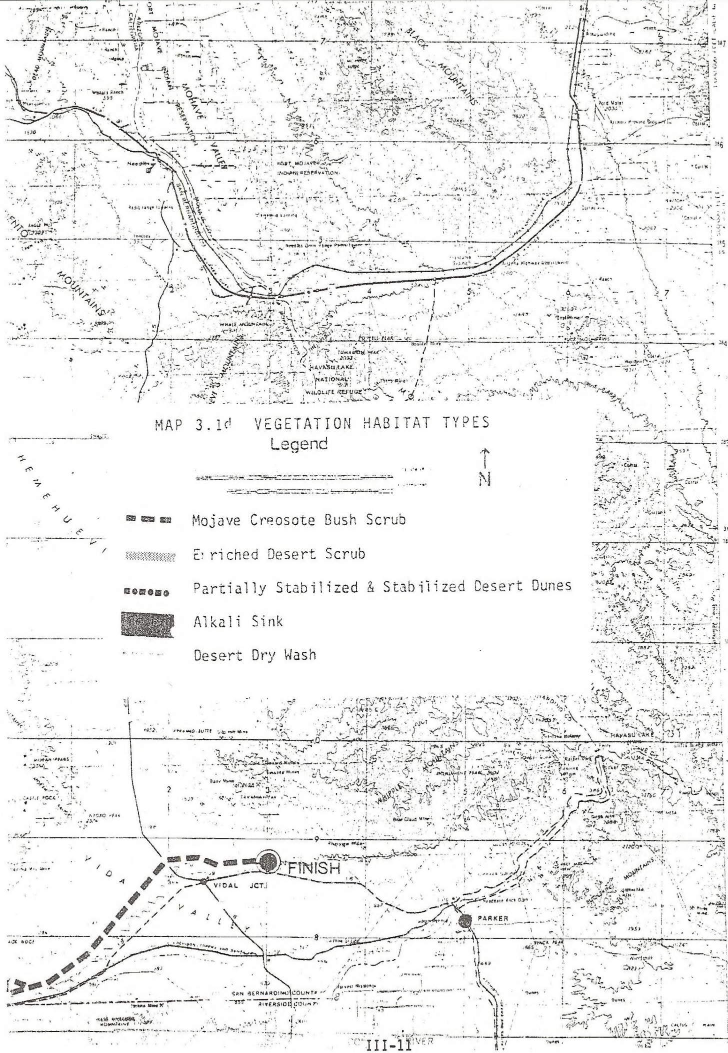
Legend

- ▬ ▬ ▬ Mojave Creosote Bush Scrub
- ▨ Enriched Desert Scrub
- ▪▫▪▫▪ Partially Stabilized & Stabilized Desert Dunes
- ■ Alkali Sink
- ··· Desert Dry Wash



MAP 3.1c VEGETATION HABITAT TYPES

Legend



MAP 3.1d VEGETATION HABITAT TYPES

Legend

were placed thirty feet from the center of the course. For each plot, all the vascular plant species were listed, individuals of each perennial species were counted, a total percent cover was estimated and the habitat type was determined. This work was done from west to east between May 20, 1980, and June 24, 1980.

Rare or endangered plant species

There are four organizations or agencies that have established lists concerning rare or endangered plant species in California. They are the Smithsonian Institution, the U.S. Fish and Wildlife Service, the California Native Plant Society (CNPS), and the California Department of Fish and Game.

The California Native Plant Protection Act of 1978 assigns responsibility to the California Department of Fish and Game for the determination of plants to be listed as endangered or rare under provisions of the act (CNPS, 1980). The California Department of Fish and Game plans to use the second edition of the CNPS's Inventory of Rare and Endangered Vascular Plants of California, as its inventory of rare and endangered plants.

This document's format for classification and definitions of rare and endangered plant species that are or may possibly be found in the impacted area of this proposed action, will be based on and closely follow the format and classification of the April 1980 edition of the CNPS's inventory. The CNPS Inventory has defined four classifications or lists which are:

(1) Plants Presumed Extinct
(2) Plants Rare and Endangered
(3) Plants Rare but not Endangered
(4) Plants Rare in California, Common Elsewhere

The plant species that are listed on the CNPS list and that were observed or possible in the proposed race corridor are listed below. No U.S. Fish and Wildlife Service listed species were observed or expected. The plant species on the Smithsonian threatened list are marked (ST). The habitat descriptions are from Cheatham and Haller (1975).

CNPS List 2 - Plants Rare and Endangered

Coryphantha vivipara var. alversonii (foxtail cactus), two plants were found, one in the area south of Ragtown and one on the north side of Sheephole Pass, habitat - rocky slopes, 2,000 - 5,000 ft.; (ST).

CNPS List 4 - Plants Rare in California, Common Elsewhere

Cynanchum utahense (Utah cynanchum), found in a wash in the Rodman Mountains Area, habitat - dry sandy places below 3,000 ft.

Pholisma arenarium (pholisma), found in a wash in the Rodman Mountains area (close to C. utahense), habitat - sandy places below 5,000 ft.;(ST).

Other plant species that are listd in the CNPS inventory and that might reasonably be found in the race corridor are listed below. Inclusion of plants species on the following list are based on two factors; the first is the habitats in which these plant species are found are included in the habitat types that the race course passes through, and the second is that other individuals of the same species have been observed and recorded (CNPS, 1980 Inventory) in the same or adjacent USGS 7.5 minute quad, as the quad the course is located.

CNPS List 2 - Plants Rare and Endangered

Calochortus striatus (alkali mariposa), reported in USGS 7.5 minute quads, Cougar Buttes, Fawn Skin, Big Bear City, habitat - alkaline meadows 2,500 - 4,500 ft.; (ST).

Erigeron parishii (Parish's daisy), reported in USGS 7.5 minute quads Rattlesnake Canyon and Fawn Skin, habitat - dry slopes 3,500 - 5,000 ft.; (ST).

Puccinellia parishii (parish alkali grass), reported in USGS 7.5 minute quad Lucerne Valley, habitat - alkali seeps 3,000 ft.; (ST).

CNPS List 4 - Plants Rare in California, Common Elsewhere

Astragalus lentiginosus var. borreganus (Borrego milk-vetch), reported in southeast section of USGS 15 minute quad. Iron Mountains, and in the Cadiz Valley (BLM, 1977b), habitat - dunes and sandy valleys below 1,000 ft.

Ayenia compacta (ayenia), observed in Cadiz Valley during vegetative survey, habitat - dry rocky canyon, below 1,500 ft.

Unique Vegetation

There are no unique habitats along the race course corridor in the sense that a given community could not be defined in terms of the generalized vegetative habitat types described later in this section. But it should be noted that in the canyon east of Box Canyon (Rodman Mountains Area), through which the course goes, the vegetation is extremely diverse and interesting from a botanical point of view, and that two rare plants were observed in this location. The plant communities throughout the stabilized sand dune habitats of the Cadiz Valley are also very interesting botantically and contain several rare plant species.

Another member of the plant biota that is unique and of high scientific value are creosote rings. Creosote rings are actually clone assemblages, a phenomenon in which a parent plant undergoes, over long periods of time, various stages of clonal expansion with enormous vegetative persistence resulting in living things that may surpass even bristlecone pines in longevity (BLM, 1977b). Several creosote rings were observed in Cadiz Valley during an aerial Survey (BLM, 1977b). As the plots where established, several rings were noted along the course. One of the largest known creosote rings is located in Johnson Valley (Vasek, 1980), but is not near the course origin.

Habitat Types

Table 3.7

Percentages of Habitat Types in Vegetative Study Area

Habitat Type	Percent
Mojave creosote bush scrub	55
Enriched desert scrub	10
Partially stabilized desert dunes	5
Stabilized desert dunes	6
Alkali sink	12
Desert dry wash	12
Total	100

Specific habitats based on Cheatham and Haller (1975).

Mojave Creosote Bush Scrub (Creosote - Bursage, Creosote Flats)

This habitat is dominant in the Mojave Desert region in the valleys and bajadas below 4,000 feet. With adequate rainfall, most perennial plant growth and annual plant flowering takes place from March through May. The shrubs are generally 0.5-3 m in height, widely spaced (Cheatham and Haller, 1975), and the ground except for times of heavy annual plant growth is bare between the shrubs.

Creosote bush, the indicator species of the habitat type, can range in importance from a common member of the community, to the only perennial shrub in some pure creosote stands. Bursage, is another prominent shrub species. Cheese-bush, desert cassia, white ratany, are also characteristic perennial shrub species. Sand mat, is a very common prostrate perennial herb. The annuals--woolly plantain, a number of forget-me-nots, white pincushion--are very prevalent and consistently found throughout this habitat type.

The Mojave creosote bush scrub habitat type is the most extensive habitat type to be impacted by the race course, and comprises over 55 percent of the race course corridor in the study area between Johnson Valley Open Area and the Parker 400 tie in.

Enriched Desert Scrub (Creosote Mixed Scrub, Creosote/Yucca, Creosote Cactus)

This habitat type, found between 1,000 and 4,000 feet, tends to be located around mountain bases on rocky well-drained slopes and alluvial fans (Cheatham and Haller, 1975). The perennial shrub species found in this habitat type show considerably more diversity and higher densities, due to increased moisture availablity, than in the creosote bush scrub, into which the enriched desert scrub integrates on lower, less steep and rocky slopes. The characteristic plants include the species found in the creosote bush scrub and others such as, brittlebush, Morman tea (Ephedra spp.), sweetbush, Mojave yucca, and a variety of cacti.

The enriched desert scrub habitat is included in approximately 10 percent of the race course. This habitat type can be found at three locations in the vegetative study area; the southern side of the Rodman Mountains, the Sheephole Pass Area, and the west side of the Iron Mountains.

Partially Stabilized Desert Dunes (Dunes and Sand Hills)

This habitat type is an intermediate between active and stabilized dunes. The habitat is basically characterized by the vegetation present having some, but limited stabilizing effect on the underlying sand dunes. The characteristic plant species can be quite varied, but the common species found where the race course intersects this habitat type include creosote bush, saltbush, bursage, plicate coldenia, silk dalea, dune primrose, and Russian thistle.

Approximately 5 percent of the proposed race course is in this habitat type. It occurs in the area west of the Calumet Mountains and in the Cadiz Valley.

Stabilized Desert Dunes (Dunes and Sandhills)

This habitat type pertains to dune areas that are well stabilized by vegetation. It is an intermediate between partially stabilized dunes and creosote bush scrub in sandy soil. The characteristic vegetation of this habitat is a combination of the intergrading habitats (Cheatham and Haller, 1975).

Approximately 5 percent of the vegetation study area of the course is in stabilized desert dune habitat. All of this is in the central and southern parts of Cadiz Valley.

Alkali Sink (Playa, Playa Edge)

These habitats are characterized by poorly drained soils with extremely high alkalinity or salt content. Alkali sinks are found throughout the Mojave Desert in valley bottoms and dry lake beds (Cheatham and haller, (1975). The important perennial plant species include ink bush, saltbush, and picklebush. Annuals commonly found in Alkali sinks include white-haired forget-me-nots, linear-leaved cambess, and woolly plantain. These habitats range from being lightly vegetated to being void of vascular plant life.

This habitat type includes about 12 percent of the vegetation study section of the proposed race course. The Alkali Sink areas affected by the race course are found around the far western edge of Bristol Dry Lake and through the center of Danby Dry Lake in Ward Valley.

Desert Dry Wash

This habitat is created by the increased moisture available in intermittent water courses and stream beds. Vegetation differentiation between a given dry wash and its adjacent slopes is quite variable. Basically, the greater the volume of the occasional water runoff, the more diverse the dry wash vegetation. Dry washes can be classified in several sub-habitats, which include: cheesebush, cheesebush/catclaw, catclaw/smoke tree, and palo verde/desert ironwood. Along with these indicator species, almost any of the other plants in any of previous habitat types could be expected in the desert dry washes.

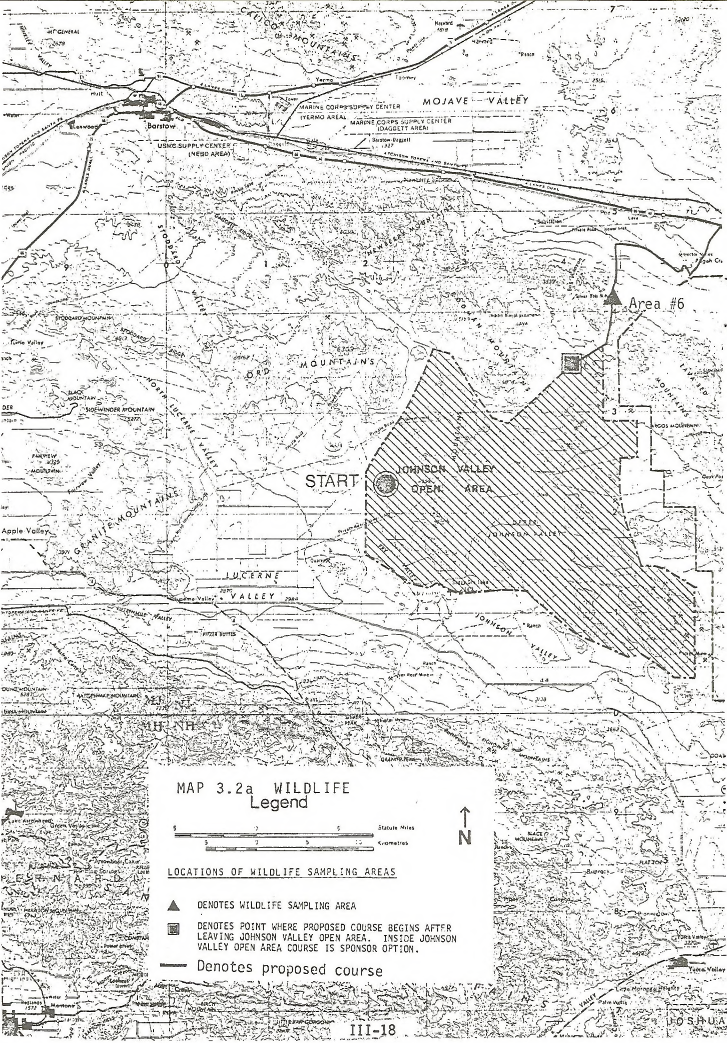
Desert dry washes occupy roughly 12 percent of the race course in the vegetative study area and probably a similar percentage in the Johnson Valley and Parker 400 sections. The course runs through extensive sections of dry wash in a number of locations, most notably heading north through the Rodman Mountains, west and south of the town of Ludlow, and the western and northern sections of the course around the Iron Mountains. Palo Verde and ironwood trees tend to be more indicative of the Sonoran Desert dry wash communities, but are occasionally found in larger dry washes in the southern Mojave. There are palo verde/ironwood dry washes in the Parker 400 section of the race course.

WILDLIFE

Methodology

A field survey of the race course was conducted from May 11 to July 5, 1980. The survey was designed to derive a species list and estimate the density of the more common species present. The methods used were walking standardized observational transects, mark and recapture of small mammals, pit trapping of reptiles and driving roads at night.

Six areas along the course were sampled. Paired experimental and control plots were used so that impacts over a period of time can be measured. The experimental plots were placed parallel to and 5 meters from the center line of the course. Control plots were placed at least 50 meters from the center of the course. A complete experimental or control



MAP 3.2a WILDLIFE

Legend

5 0 5 Statute Miles

5 0 5 10 Kilometres

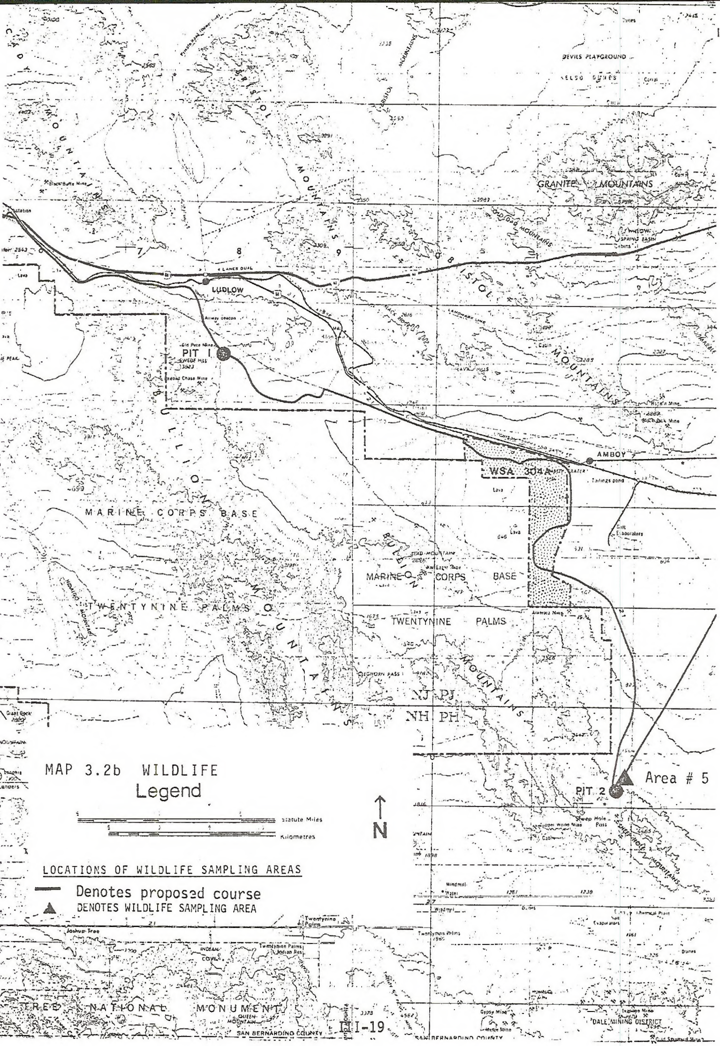
N

LOCATIONS OF WILDLIFE SAMPLING AREAS

▲ DENOTES WILDLIFE SAMPLING AREA

▣ DENOTES POINT WHERE PROPOSED COURSE BEGINS AFTER LEAVING JOHNSON VALLEY OPEN AREA. INSIDE JOHNSON VALLEY OPEN AREA COURSE IS SPONSOR OPTION.

— Denotes proposed course



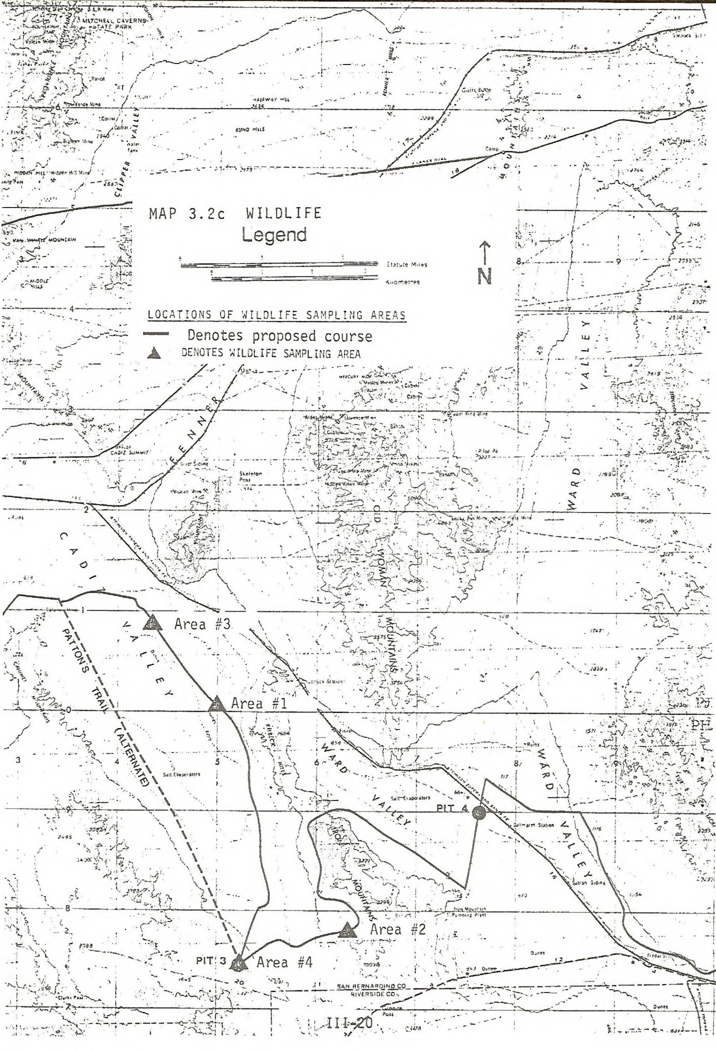
MAP 3.2b WILDLIFE

Legend

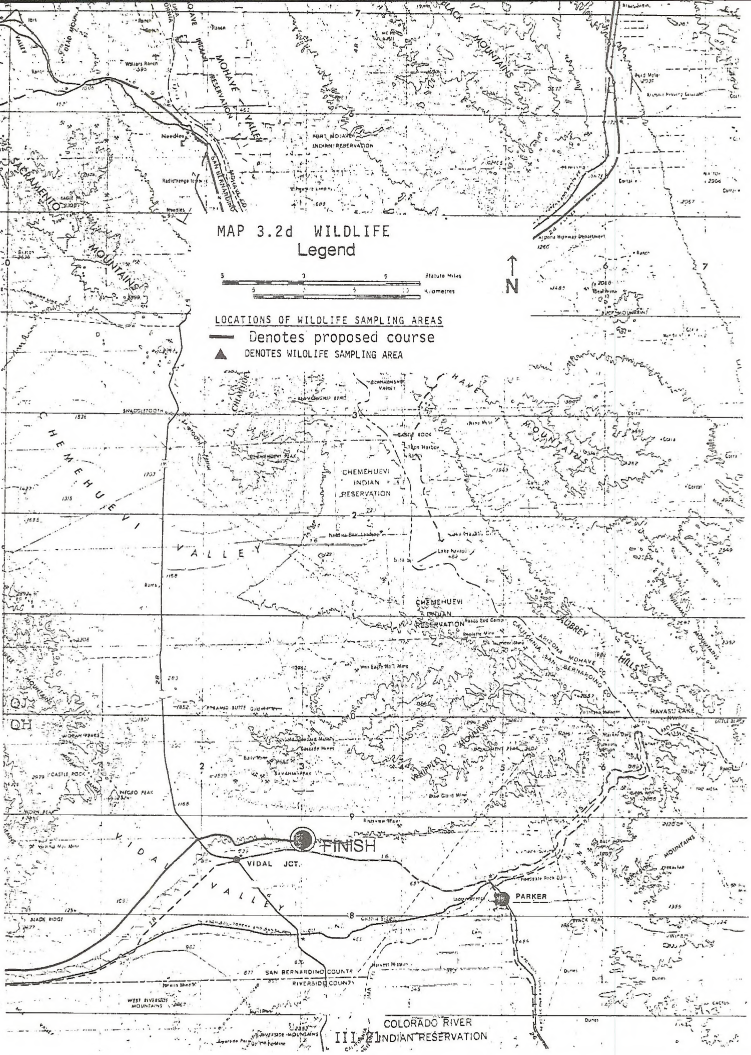
LOCATIONS OF WILDLIFE SAMPLING AREAS

▬ Denotes proposed course

▲ DENOTES WILDLIFE SAMPLING AREA



MAP 3.2c WILDLIFE



MAP 3.2d WILDLIFE

Legend

LOCATIONS OF WILDLIFE SAMPLING AREAS

— Denotes proposed course

▲ DENOTES WILDLIFE SAMPLING AREA

plot consisted of 51 pit traps, 96 small mammal traps, a 2 kilometer by 40 meter bird transect and a 1 kilometer by 10 meter reptile transect. The pit traps were arranged in a 3 x 17 grid pattern at 10 meter spacing. The small mammal traps were placed in a 3 x 32 grid or an 8 x 12 grid and spaced 10 meters apart. A few variations of these grid systems were used due to topography and the arrangement of the course. At each plot data was collected for four consecutive days and nights. Refer to map 3.2 for locations of wildlife sampling areas.

Endangered and Threatened Species

No federally listed endangered or threatened species of wildlife are known to occur in the affected area. The bald eagle (endangered) may be transient, particularly along the Colorado River. The brown pelican (endangered) has been observed at Iron Mountain pumping station (BLM, 1977b), which is in the immediate vicinity of the proposed race course.

State-Listed Endangered or Rare Species

No State-listed endangered or threatened species of wildlife are known to occur in the affected area. The California yellow-billed cuckoo and the Yuma clapper rail, both listed as rare, inhabit and breed along the Colorado River (Gaines, 1978; Calif. Dept. Fish and Game, 1978).

BLM Sensitive Species

The Bureau of Land Management has nominated 31 species of wildlife as being sensitive within the State of California (Instruction memorandum No. CA-79-295, August 2, 1979). Sensitive species merit special attention in the BLM planning and decision making processes to prevent further declines in population numbers that would necessitate the species becoming either state and/or federally listed. To date only one species, the desert tortoise, is formally listed as sensitive; official designation of the remaining species is soon forthcoming. In addition to being listed as sensitive, the U.S. Fish and Wildlife Service, Office of Endangered Species published a Notice of Status Review" for the desert tortoise (Federal Register, August 23, 1978). Berry and Nicholson (1979) recommended that the desert tortoise be formally proposed for threatened status on the Federal List of Endangered and Threatened Wildlife. The desert tortoise occurs in most areas along the proposed course; however, noteworthy population densities of this species (20 to 50 per square mile), relative to the proposed course, are restricted to Vidal Valley along the final leg of the Parker 400 segment.

Other (nominated) sensitive species occurring within the affected area include the golden eagle and the desert bighorn sheep and Panamint kangaroo rat. The golden eagle ranges throughout the affected area but is uncommon to rare. The desert bighorn is encountered primarily in mountain ranges which the proposed (and alternate) course avoids. Noteworthy populations of desert bighorn conceivably affected by the proposed action include the Old Woman Mountains (estimated 45 individuals) and the Turtle Mountains (estimated 50 individuals) (Weaver and Hall, 1971; Weaver, 1972). The Panamint kangaroo rat has been observed in Johnson Valley (Bury, and others, 1977).

Other Significant Species

Significant species are defined here as (1) species which are fully protected under State Law, (2) species which are presently listed on the National Audubon Society's Blue List (of birds whose numbers and/or range is diminishing either regionally or nationally), or (3) species whose numbers are limited due to restricted habitat or position in the food chain.

Fully protected species occurring in the affected area include the desert tortoise and kit fox. The ring-tail and mountain lion may also occur.

Blue-listed birds include the marsh hawk, prairie falcon, American kestrel, loggerhead shrike, Swainson's hawk (BLM, 1977b), yellow warbler, vesper sparrow, burrowing owl, and barn owl. These species are from the 1979 Blue List (Arbib, 1979) and all may be encountered along various portions of the proposed (and alternate) course.

Many of the significant predatory species (carnivores, raptors and owls) have already been mentioned. Predators are necessarily limited in numbers due to their high position on the food chain and therefore must be considered significant.

Significant Habitats

Figures 3.1 through 3.6 show examples of several habitats along the course. Species restricted due to specialized habitat requirements are often quite common within those habitats. However, such habitats are generally spottily distributed (or otherwise rare over broad regions) and as such comprise ecological "islands." Sand dunes are examples of restricted or uncommonly encountered habitats in the California desert. Differences in substrate textures, vegetative composition, surface temperatures and dessication rates from surrounding areas have caused the evolution of plants and animals which are highly adapted for survival in these sandy areas and may not be represented elsewhere because of isolating mechanisms preventing their spread. The dunes to the east and south of Cadiz Dry Lake comprise such a restricted habitat and their fauna is, therefore, of special interest and importance. Species characteristic of the dunes and peripheral sand hills include the Mojave fringe-toed lizard, the Mojave Desert sidewinder, the western shovel-nosed snake, and desert kangaroo rat. The latter three species may occur in habitats other than dunes and sandhills (e.g. washes, low sandy areas), but fringe-toed lizards are restricted to these areas of fine, loose sand (Stebbins, 1966). The same applies to certain endemic species of invertebrates. Over 60 species of beetles, many of which are adapted only for existence in dune habitats, occur on the Cadiz Dunes (Andrews, and others, 1979). A previously unknown genus and species of beetle (family Chrysomelidae) has been discovered on the Cadiz Dunes (Andrews, and others, 1979).

Large dry washes, particularly with tree-like vegetation such as catclaw, smoketree, desert willow, palo verde and ironwood, comprise another relatively important habitat for wildlife, particularly birds. Some species, such as the verdin, phainopepla, long-eared owl, western tanager, northern oriole, warblers, vireos, and hummingbirds, are generally restricted to these habitats due to the greater plant species diversity and increased availability of food and cover.

One wash identified as having a particularly diverse plant assemblage and supporting more bird life than other washes inventoried along the course, is located in the canyon immediately east of Box Canyon several miles after the proposed course leaves the Johnson Valley Open Area.

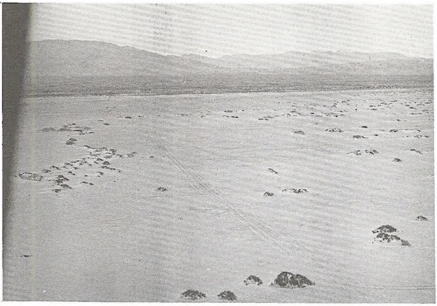


Figure 3.1: Playa habitat (Bristol /dry Lake).

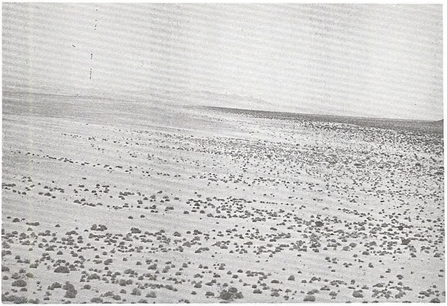
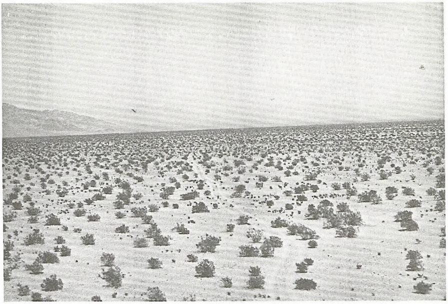
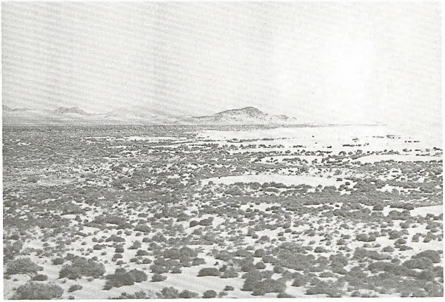


Figure 3.2: Playa edge habitat (Bristol Dry Lake).





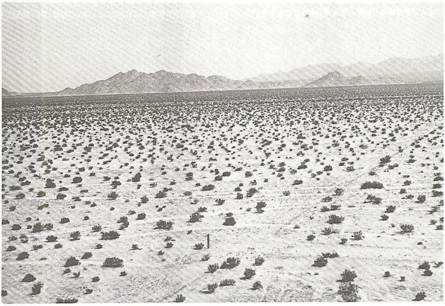


Figure 3.5: Creosote/bursage habitat
(Northeast of pit area 3).

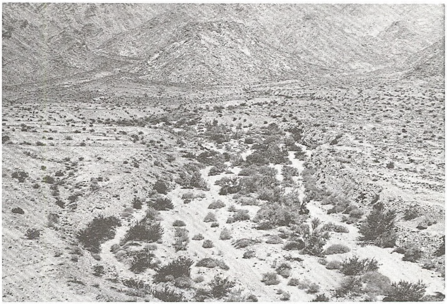


Figure 3.6: Desert dry wash-smoketree/catclaw
(West of Iron Mountains).

However, the only large washes supporting palo verde and ironwood (perhaps the most diverse and desirable of wash habitats) occur along the Parker 400 portion of the proposed race course (BLM, 1979a). Such wash habitats, for purposes of wildlife habitat assessment, are considered sensitive and important.

Other wildlife habitats occuring along the course were creosote flats (sparsely vegetated), creosote/bursage, Mojave yucca/creosote, playa and playa edge. These habitat types are not judged to be significant, sensitive, or sufficiently important to warrant further discussion. Refer to Appendix B-2 for species associated with these types.

No habitat types or species' ranges not already discussed are encountered in the public comment alternate course. This course runs through the Kilbeck Hills, largely in washes dominated by smoketree and catclaw. Several raptor eyries (Golden Eagle and Red-tailed Hawk) are also located in the Kilbeck Hills.

CULTURAL RESOURCES

Methodology

Cultural resources located on or adjacent to the race route were inventoried using the following methods: (1) a search of the existing literature, (2) an examination of the cultural resource site records, and (3) an intensive field survey. Based upon this study, it was found that the Johnson Valley to Parker Race Course passes through areas in the desert which contain a relatively low site density.

The following is a summary of the survey methodology for various segments of the race course and the findings. See Appendix C for a description of the cultural resource sites.

Johnson Valley to Bench Mark 1097 (4 miles east of Bagdad)--Total: 45 miles. This portion of the race corridor was surveyed by the Regional Environmental Consultants (RECON) on May 5, 6, and 8, 1980. The type of survey undertaken was a vehicle reconnaissance or "windshield survey" because the route in this area consists of graded dirt roads, old railroad beds, and/or open washes. The survey was accomplished by a two-person team; the archaeologists drove slowly along the pre-flagged race course and stopped at points where the potential for the occurrence of cultural resources was considered high. Particular attention was paid to benches and prominent rock outcrops. RECON considered the potential for discovering any substantial historic or archeological sites as relatively high by using this method. As a result of the survey, four Native American sites (LP-21, 24, 28 and 29) and five historic sites (LP-19, 20, 23, 25 and 27) were noted.

In January of 1980, the Riverside District BLM conducted a Class I Cultural Resource Overview of the Pisgah Geothermal Study area. During the field assessment, the following sites were recorded along the proposed race route: PS-2, PS-3, PS-4, PS-11 (also recorded as LP-24), PS-13, and PHS-1 and 2. These sites are all located in the immediate vicinity of the Pisgah Lava Beds.

Sites recorded in the same vicinity, previous to the above study include SBCM-410, 4-SBr-2330 and 4-SBr-2328. These sites are also located adjacent to the race course.

Sites numbered PS-11, PS-13, 4-SBr-2328 and LP-24 are designated as the Lavic Archaeological District.

For futher cultural resource information see Brooks, Wilson and Brooks (1979); Musser and Hardaker (1980); Norwood (1980); Warren (1979).

Benchmark 1097 to one mile north of Amboy Crater. Total: 11 miles. A team of three archaeologists from RECON surveyed this segment of the route between March 27 and April 3, 1980. Spacing between team members did not exceed 30 meters. A two hundred foot wide corridor was covered on foot. As a result of this survey one site was recorded (see LP 16). Further cultural resource information may be obtained from Gallegos (1979); Norwood (1980).

One mile North of Amboy Crater to the southern Lava beds. Total: 9 miles. The entire length of the course bearing through the Amboy Crater vicinity was surveyed on foot by the Riverside District Archeologist in 1979 (BLM, 1979b). This portion of the route is sensitive as 13 sites have been located within 2 miles of the proposed route. One site recorded by WESTEC (Gallegos, 1979) is located within 1/8 mile of the course (see site 4-SBr-3248.)

Southern Lava beds to Calumet Mine Area (3 miles east of Bristol Lake). Total: 21 miles. This portion of the course is run on an existing dirt road which bears through recent alluvial fans. The area is not considered to be sensitive and no sites have been recorded here. A vehicular reconnaissance or "windshield survey" was performed on this portion of the course by the Riverside District Archaeologist (BLM, 1979).

Calumet Mine Area to South Iron Mountains. Total: 42 miles. For survey methodology see #2, "Benchmark 1097 to Bagdad" above. As a result of this survey four sites were recorded (see LP-7, 8, 11 and 14). Further cultural resource information may be obtained from: BLM (1977); Gallegos (1979); Norwood (1980).

South Iron Mountains to Cadiz Dunes. Total: 4 miles. This portion of the race route was surveyed by four BLM archaeologists on June 10, 1980. Team members surveyed this three mile long segment on foot with a 20 to 30 meter spacing between each member. No cultural resources were located. Further cultural resource information may be obtained from: BLM (1977); Gallegos (1979).

Cadiz Dunes to Danby Lake. Total: 18 miles. For survey methodology see #2. "Benchmark 1097 to Bagdad" above. As a result of this survey two sites were recorded (see LP-2 and 6). Further cultural resource information may be obtained from: BLM (1977); Norwood (1980); Warren (1979).

Danby Lake to Thunder Alley. Total: 6 miles. From a point on the northeast edge of the Iron Mountains to "Thunder Alley" (northeast of Danby Lake) the course bears through terrain which is deemed to be of relatively low archaeological sensitivity. This is a dry lake environment of highly saline soil composition. The area was examined through vehicle reconnaissance or "windshield survey" by RECON. Because dry lake shorelines in the California Desert usually yield some cultural deposits these areas were examined on foot. No cultural resources were encountered in this portion of the course. Further cultural resource information may be obtained from: BLM (1977); Gallegos (1979); Norwood (1980); Warren (1979).

Thunder Alley to finish line. Total: 37 miles. Between February 27 and March 21, 1980, three BLM archaeologists from Havasu Resource Area, BLM, inspected the remainder of the race route as part of the environmental assessment effort for the 1980 SCORE 400 race.

The portion of the route from Thunder Alley to 11 miles within the finish line is considered to be low in cultural resource sensitivity. The route used is a road approximately 20 feet wide. This section was spot checked every 1/2 mile by walking over a circular area having a maximum radius of 50 meters. Additional checks were made at selected areas considered to be more sensitive - wash banks, desert pavements or pebble terraces. No cultural resources were located.

The remaining 11 miles of the course was surveyed on foot. A 200-foot wide corridor was examined with the maximum spacing between personnel at 30 meters. All of the sites recorded were within 8.1 miles of the finish line. A district of lithic scatters (AZ-05-522, 523 and 524) was located. This district has been named the Vidal Archaeological District. Further cultural resource information may be obtained from: Gallegos (1979); Mann (1980).

A walk-over survey, conducted by BLM archaeologists at Pits 1 through 4 and the finish area revealed no cultural resource material.

The National Register of Historic Places, Executive Order 11593 and the National Historic Preservation Act (NHPA) of 1966, as amended (16 U.S.C. 470), directs all Federal agencies to take into account the effects of their actions on properties included in or eligible for inclusion on the National Register of Historic Places. None of the sites located meet the Criteria for Evaluation of National Register Property. Although all historic and prehistoric sites meet "Criterion D" ("...have yielded or may be likely to yield, information important to pre-history or history"), this alone does not qualify them for the National Register. The sites or districts must also possess integrity of location, feeling and association. Of all cultural resources located during the inventory of sites along the race course, only the following sites are considered to be potentially eligible for the National Register based upon the criteria given above. (A complete list of the sites located in the race corridor and National Register data are located in Appendix C.)

Vidal Junction Archaeological District includes three distinct areas, AZ-05-522, 523 and 524. The areas include clusters of extensive pre-historical lithic workshops, sleeping circles and rock alignments. Although some of the area has been scarred by ORV tracks, in general, the district is well preserved (Mann, 1980).

Lavic Archaeological District. This potential district includes sites numbered 4-SBr-2328, LP-23, PS-13, PS-11 and SBCM-315. Natural sources of chalcedonies, jaspers and basalts located in this area were exploited by prehistoric populatins for use in lithic tool production. Many of the tools and worked materials are patinated and are cemented into the soil by a natural calcrete indicating a relatively early age. The integrity of the proposed archaeological district has been disturbed by rockhounding activities in recent years; both "Desert Gem Trails" (Strong 1971:52) and "Footprints" (McShan and McShan, 1980) contain articles which have popularized the area. In order to evaluate this potential district in terms of National Register status, a comprehensive examination by a lithic expert of this extensive area would be necessary (BLM, 1977; Brooks, Wildon, and Brooks, 1979).

Patton's Trail Alternative

On September 10 and 11, 1980, three BLM archaeologists surveyed the portions of the Patton's Trail alternative which divert from Patton's Trail proper (Piccadilly Lane). One hundred feet on both sides of the flagged line were assessed for cultural resources. Patton's Trail proper was "window" surveyed by the BLM Riverside District archaeologist in 1979. No cultural resources were locatd in either area other than military debris and features remnant of General Patton's World War II military maneuvers.

Public Comment Alternative

1. By using the SCE transmission line maintenance road to US 66, the course would avoid passing nearby three archeological sites (PS-2, 3 and 4). On May 25, 1978, archeologists from DRI (Desert Research Institute of the University of Nevada) surveyed a 1/8 by 1 mile transect which cut north and south through the maintenance road, as part of the inventory of the BLM California Desert Conservation Area. Both DRI and RECON (who "window" surveyed part of this alternative in May of 1980) located two loci of isolated core detritus of little significance (see 4-SBr-1505A and LP-22).

2. During January of 1980, the Public Comment Alternative which parallels US 66 on its south side was window surveyed by BLM Archaeologists as part of the Environmental Assessment for the Pisgah Geothermal Study Area. Although no new sites were recorded, a site, 4-SBr-1905, first recorded by G. Smith (no date) was resurveyed. Found was naturally occurring jasper quarried prehistorically for use in the production of stone tools. The site appears to be protected from off-road vehicles because of its location on the hill.

3. No cultural resources were located during RECON's archaeological reconnaissance of the portion of the course bearing through pit 1, proposed in the public comment alternative.

4 and 5. The public comment alternate course located on the southern periphery of Bristol Dry Lake (9 miles) was surveyed by a team of three BLM Archaeologists on September 8, 1980. One hundred feet on both sides of the flagged line was surveyed. No cultural resources were located.

6 and 7. The public comment alternate course bearing through the Kilbeck Hills and south to the Iron Mountains was surveyed by a team of three BLM Archaeologists on September 9, 1980. One hundred feet on both sides of the flagged line was surveyed on foot. Located was historical debris, remnant of General Patton's World Warr II military maneuvers. Bottles, cans and tank tracks from the 1940's were encountered.

8. The flagged alternative route which circumvents a private section of land on the SCORE Parker 400 course was surveyed on foot by a BLM Archaeologist on September 11, 1980. One hundred feet on both sides of the flagged line was assessed. No cultural resources were encountered.

NATIVE AMERICAN CONCERNS

The race course from Johnson Valley to Parker crosses traditional use land of the Serrano, Chemehuevi and Mojave Indians. Since pre-historic times the desert has been exploited by Native Americans for food and craft materials. Trade trails from the river to the Pacific Coast criss-cross the desert and were used by explorers in their early contact with these desert tribes.

These desert dwellers were hunters and gatherers traveling from place to place in their constant search for food. The Mojaves lived along the Colorado River but did extensive trading in the San Joaquin Valley, Chumash Villages of Santa Barbara, and the Los Angeles Area. Kroeber (1925) records that early non-Indians using the Mohave Trail recorded contact with Mojaves returning from the coast with trade goods.

The Chemehuevi lived near water sources in the mountains from Death Valley to the Chocolates. They would travel from place to place as the food ripened and then move on when it was gone. Many oral stories of special places in the desert are recounted by some of the tribal elders.

The Serrano resided in the San Bernardino and San Gabriel Mountains. They would venture into the desert when the food was ripe and the hunting good then return to their canyon homes.

Native American concerns for the Johnson Valley to Parker Race were determined by contacting members of the tribes from Ft. Mojave, Chemehuevi, Colorado River and San Manuel Serrano.

Johnson Valley

Johnson Valley is a traditional use area for the Serrano. It was a hunting and gathering area and also figures prominently in the oral traditions. There are campsites recorded around Soggy Dry Lake and some burials in various locations of the valley. This area is still used for food and craft collecting today.

Pisgah Crater - Amboy Crater

Both Pisgah and Amboy Crater figure in Mojave and Chemehuevi traditional use. A trade trail which crosses Lavic Lake to the Newberry Mountains is part of the Mojave oral traditions.

Bristol Lake

Bristol Lake has been a salt collecting area since pre-historic times. As recent as 1930 both Chemehuevi and Mojave were recorded in the lake bed collecting the salt left after the winter rains. A trade trail crossing the middle of the lake was also used by the Serrano. The area is still used for seasonal food and craft material collection.

Calumet Mountains

The Calumet Mountains are a traditional Chemehuevi hunting area for deer and mountain sheep.

Cadiz Valley

The proposed course crosses a traditional Chamehuevi-Serrano trail twice in Cadiz Valley. Seasonal occupancy for gathering has been recorded in historic times and the lake was also used for salt collecting.

Iron Mountains

Traditional Chemehuevi and Serrano trade trails are recorded going south and southeast past the Iron Mountains.

Ward Valley

Ward Valley is a traditional gathering area for Chemehuevi and Mojave and is still used today. Danby Lake is crossed by the Chemehuevi and Serrano trade trails and is part of the salt collecting trade.

Turtle Mountains

The Turtle Mountains are a traditional occupation and hunting area for the Chemehuevi Tribe. The course enters traditional lands on the southern fringe of the mountains. A trade trail to Yuma begins here and is crossed by the race course.

Vidal Valley

Several Chemehuevi trails from Chambers Well and West Well cross Vidal Valley to meet the main trail to Yuma from Cottonwood Island on the Colorado (Laird, 1976). Campsites are also recorded in this area.

VISUAL RESOURCES

To manage visual resources present on public lands, BLM assigns areas to a visual resource management (VRM) class, each class having distinct management goals and limitations on allowable changes, or impacts, to the existing landscape. These classes are based on three elements: the scenic quality of the landscape, the sensitivity to change as felt by people familiar with the area, and distance from viewing areas such as roads or towns.

VRM Class I provides primarily for natural ecological changes with very limited management activity; Class II allows changes in the basic elements of form, line, color and texture so long as they are not evident in the characteristic landscape--a contrast may be seen but should not attract attention. Class III permits actions that begin to be evident, but only if changes are still subordinate to the characteristic landscape. Class IV, the most use-oriented, allows actions that attract attention and that may dominate the landscape, but provides that such changes should repeat the basic elements that were inherent in the original landscape.

The proposed course does not cross any lands in VRM Class I. Wilderness study areas 304 and 304A as well as a few areas scattered over the course are VRM Class II. The rest of the course is evenly divided between Class III and IV areas.

WILDERNESS

Five wilderness study areas (WSAs) would be affected to some extent by the proposed action. Three of them (WSAs 207, 305 and 307) have rights-of-way whose associated maintenance roads will be used for the course. In two areas (WSAs 304 and 304A), the course travels through areas under wilderness review. The public comment alternative avoids WSA 304 and the eastern boundary of WSA 207.

Until Congress actually designates an area of public land as wilderness, all areas under wilderness review will be managed so that wilderness values will not be impaired. The "Interim Management Policy and Guidelines for Lands Under Wilderness Review" (IMP, December 12, 1979) defines an action as non-impairing if (1) it is temporary; (2) any temporary impacts can be reclaimed to a condition of being substantially unnoticeable by the time the Secretary of the Interior sends his recommendations to the President (FY-83 or 84 for CDCA areas); and (3) after an action the area's wilderness values have not been degraded so far, compared with the area's values for other purposes, as to significantly constrain the Secretary's recommendation with respect to the area's suitability or non-suitability for preservation as wilderness.

There is specific guidance in the IMP for organized ORV events. Such events may be allowed to pass through WSAs on existing ways and trails so long as the BLM has determined that such uses satisfy the non-impairment criteria. Participants will be restricted to designated ways and trails, which will be appropriately flagged. Assembly areas, start or finish lines, and gasoline pit stops will not be allowed. If the BLM determines that a race can and will be carefully controlled to ensure that it fully satisfies the nonimpairment criteria, the use of cross-country route segments may be approved (see Appendix E-3).

The five areas that would be affected are discussed in the order they appear from the start in Johnson Valley to the finish. Map 3.3 shows affected WSA boundaries. The final narratives describing the results of BLM's wilderness inventory appear in Appendix E-1.

WSA 207--Rodman Mountains

The proposed course uses a transmission line road which is entirely within the right-of-way that forms the southern border of the WSA, and a maintained pole line road used for the eastern boundary. Much of the pole line road is in a wash through a small canyon, effectively preventing any straying off course. The public comment alternative avoids the eastern boundary of this WSA.

WSA 304A--Amboy Crater

The course would travel 13-1/2 miles through this WSA (Map 3.3). Two miles are on private lands not affected by the IMP. In many places no road or way exists at present, but the proposed course follows as closely as possible the route used for similar races in 1972 and 1975.

Six sections (T. 5 N., R. 11 E.) within this WSA have been declared eligible for designation as a National Natural Landmark. The part of the course over the proposed landmark crosses private land, however, and makes use of existing routes.

Although much of the area is undisturbed by man, some intrusions are apparent. (For examples, see Figures 3.7, 3.8, 3.9 and 3.10.) A trail leading to the top of the cinder cone is visible from Highway 66 and Amboy Road. Well defined vehicle routes run for a few miles through the lava field near Highway 66 and around the base of the cone. Trash is obvious within the bounds of the WSA in many places ranging from beer cans and bottles to abandoned autos or old dump sites. One section is a material sales site.

There are four distinct segments through which the course passes.

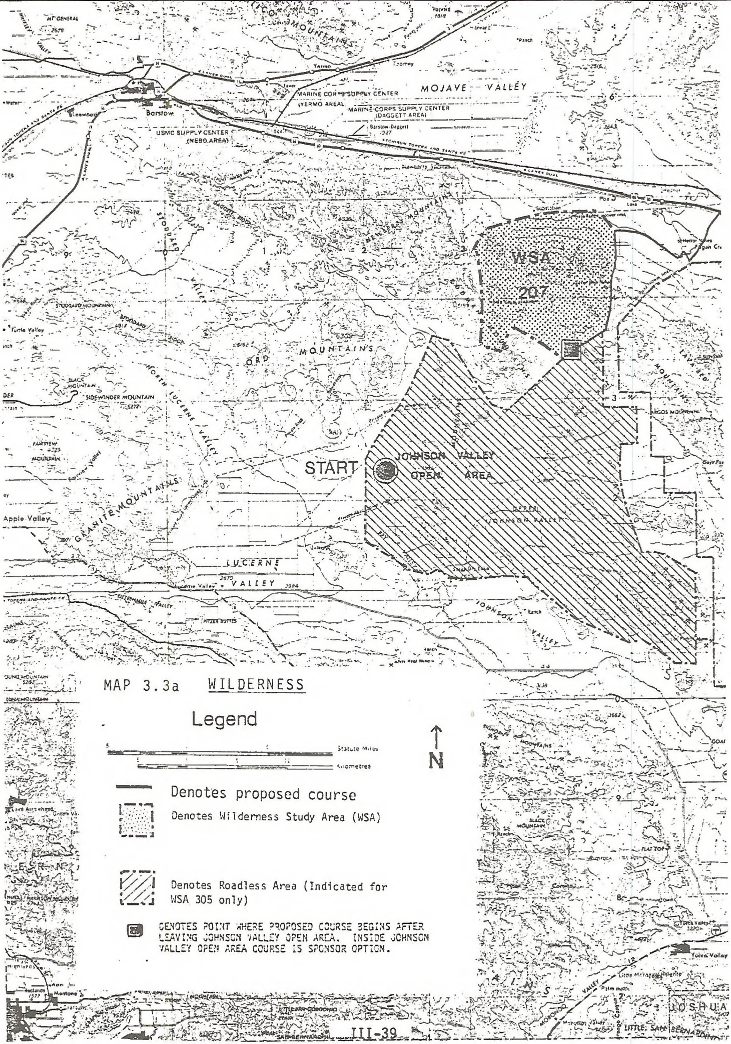
Segment 1--4 miles

The course enters the WSA a short distance south of Bagdad where it goes east from a military access road. It crosses a bajada dissected by innumerable braided washes running north to south. The surface varies from loose sand to compacted alluvium; vegetation is sparse, mostly creosote bush and salt bush.

Most of this segment does not follow a presently existing route. Some old vehicle tracks made by military maneuvers are in the vicinity and there are traces of random ORV use. One mile of the course crosses private lands on which IMP guidelines do not apply.

Segment 2--3-1/2 miles

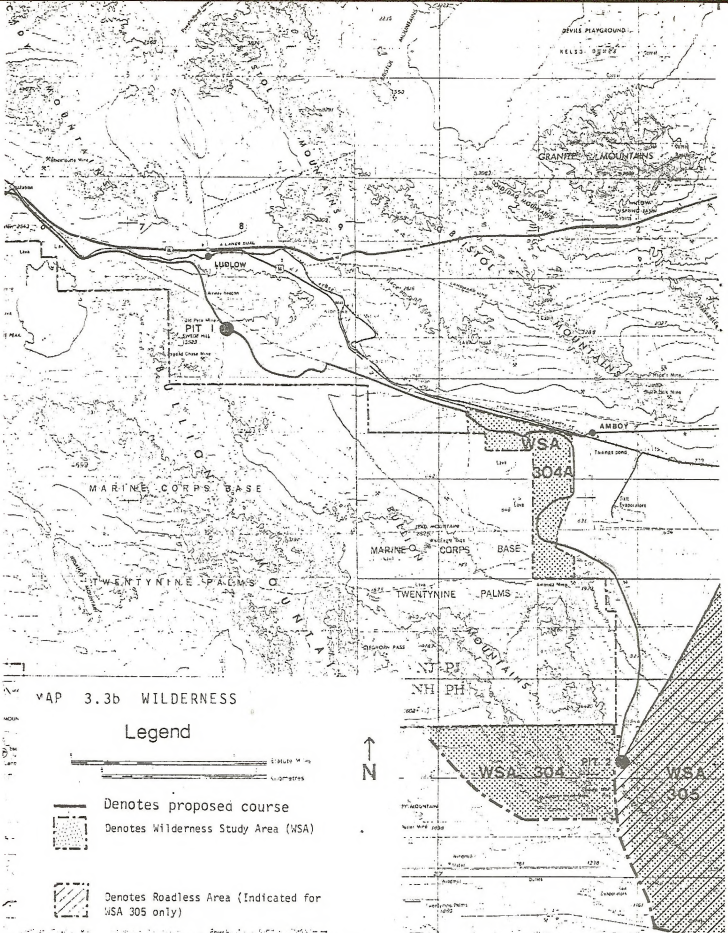
For the next 3-1/2 miles, the course goes in and out of the northern edge of the lava flow. Most of this course segment uses existing and well-defined vehicle routes; vehicle scars and other signs of man are much more numerous in this area, in part because Highway 66 is within 1/4 mile of the proposed course. From discussion with local residents, the area is used by youths for drinking parties, an observation borne out by the numerous bottles and cans littering the ground. The surface here varies from solid or broken lava to loose sand. Vegetation, when present, is very sparse, dominated by grasses and small bushes. A little over one mile of the course crosses private land in this segment, for which IMP guidelines do not apply.



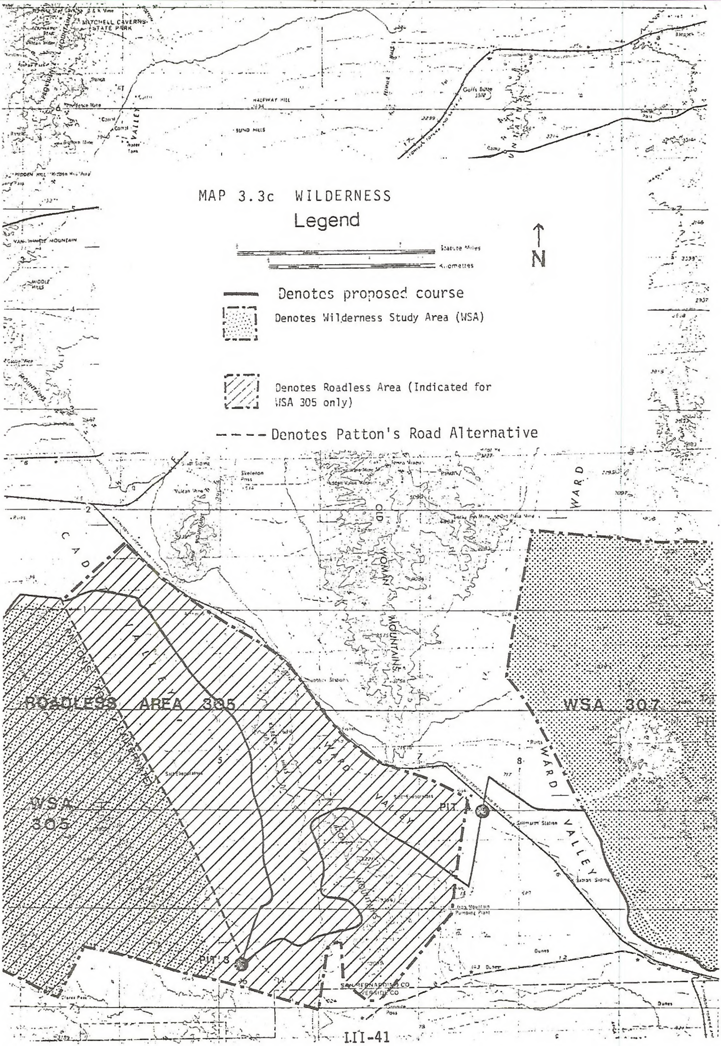
MAP 3.3a WILDERNESS

Legend

▬	Denotes proposed course
▒	Denotes Wilderness Study Area (WSA)
▨	Denotes Roadless Area (Indicated for WSA 305 only)
■	DENOTES POINT WHERE PROPOSED COURSE BEGINS AFTER LEAVING JOHNSON VALLEY OPEN AREA. INSIDE JOHNSON VALLEY OPEN AREA COURSE IS SPONSOR OPTION.

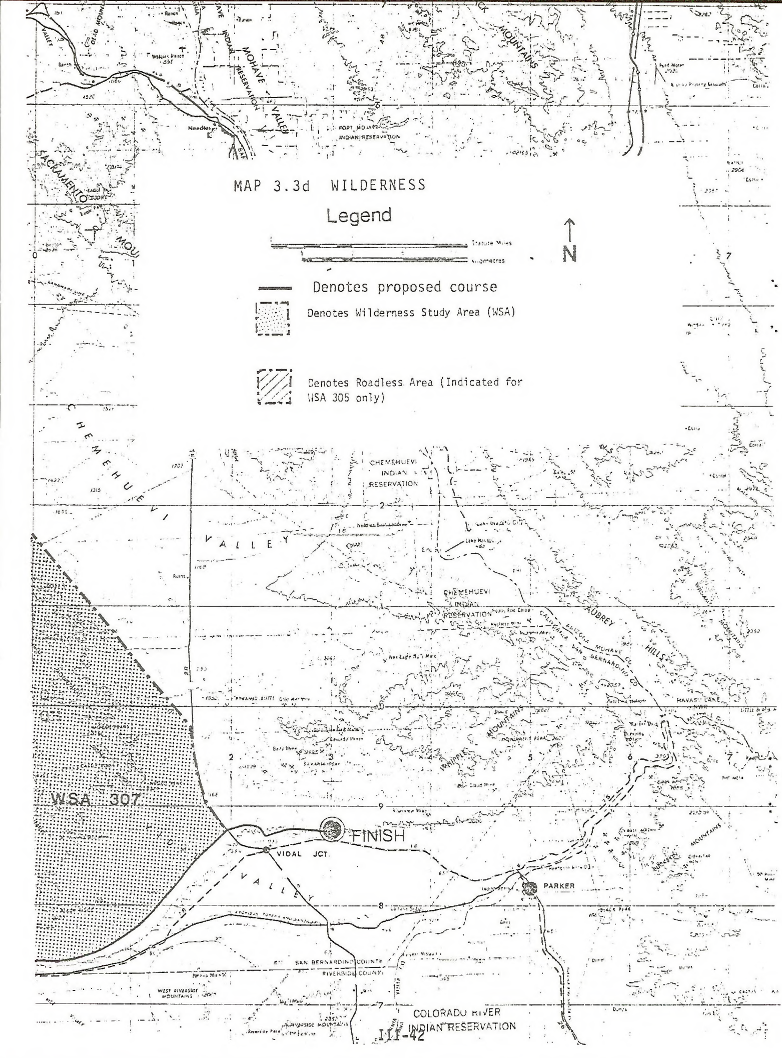


MAP 3.3b WILDERNESS



MAP 3.3c WILDERNESS

Legend



MAP 3.3d WILDERNESS

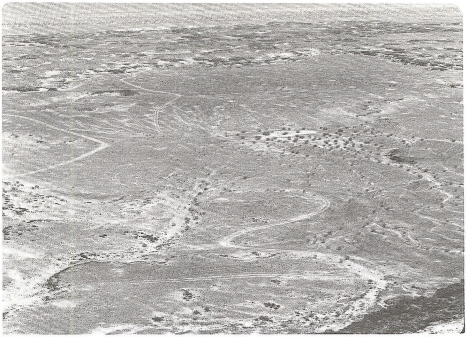


Figure 3.7: Existing ways as seen from the top of Amboy Crater, looking north into WSA 304 A.

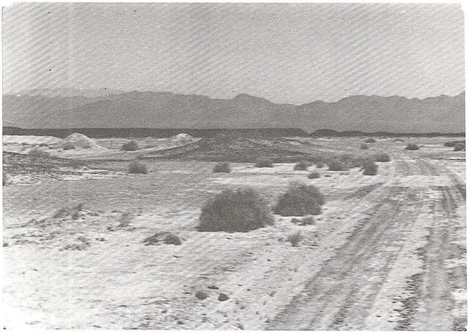


Figure 3.8: Surface disturbance in WSA 304 A near Highway 66. Segment 1 passes through one section of land used for material sales.

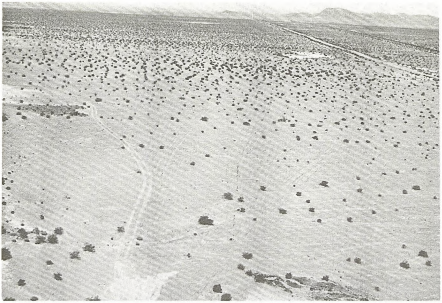


Figure 3.9: WSA 304 a - Looking west near the northern edge of Amboy Crater's lava flow. The bajada over which the lava flowed has been used in the past for limited tank maneuvers and ORV play.

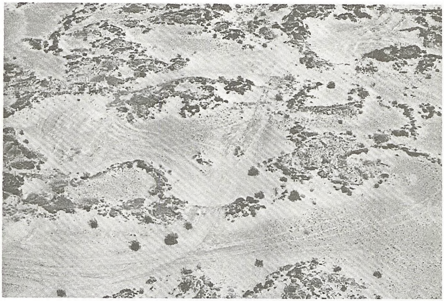


Figure 3.10: WSA 304 a - Segment 2 in WSA 304 A contains numerous vehicle tracks, some of them used for the proposed course. (The course goes down through the center of the picture).

Segment 3--1 mile

The course goes cross country for one mile before leaving the WSA, following a wash characterized by comparatively dense vegetation and unconsolidated sands and gravels.

The course stays outside the WSA's east boundary for the next 4 miles. Washes, old vehicle tracks and some areas disturbed by salt mining from the course. The eastern boundary of the potential WSA was adjusted to exclude these intrusions.

Segment 4--5 miles

The WSA is re-entered just before the course goes onto the surface of Bristol Dry Lake. Approximately 5 miles of the course runs over the extreme western end of the lake bed before leaving the WSA for the last time. The surface is fine to medium sand/dirt, in places very loose, in others crusted over by salts.

WSA 304--Bullion Mountains

The proposed course uses a pole line maintenance "way" for approximately 3 miles before crossing Amboy Road and leaving the WSA. This is a well-defined route just within the bounds of the WSA which crosses sandy and easily reparable terrain. The public comment alternative avoids this WSA entirely.

WSA 305--Sheephole and Cadiz Valleys

The western half of roadless area 305 (Map 3.3) was designated as a wilderness study area. This decision was under appeal to the Interior Board of land Appeals (IBLA) by the National Outdoor Coalition (NOC) when the draft EIS was being prepared. Since then, the NOC has requested dismissal of their appeal. The appeal was directed only at the western half of roadless area 305, which was designated as a wilderness study area. The eastern half (crossed by the proposed course and alternatives) is not under wilderness review and, therefore, not subject to IMP guidelines.

The proposed course borders the WSA on the northwest following an existing telephone line road. The (revised) Patton's Trail alternative borders the WSA on the northeast side for approximately 20 miles. In either case, no impairment to the WSA's wilderness values will result from the running of a race.

WSA 307--Turtle Mountains

The roadless area boundary on the south is Highway 62 and the Colorado River Aqueduct, but the WSA boundary is two unmaintained ways used for the annual Parker 400, and proposed for use by the Johnson Valley to Parker race. The area south of these routes was excluded from further consideration as wilderness because of a network of unimproved ways and the extensive system of flood control dikes that border the Colorado River Aqueduct. No impairment of wilderness values resulted from the 1980 running of the Parker 400.

RECREATION

Much of the proposed course has been used at various times in the past for hare-hound races under the sponsorship of the Checker's Motorcycle Club, with participation ranging up to 1,200. Recreation use along or near the proposed race corridor shows a range of activities and user densities typical for the desert as a whole. Johnson Valley Open Area receives 74,844 Visitor-use days each year. (A VUD is 12 visitor hours which may be aggregated continuously, intermittently or simultaneously by one or more persons). Approximately 50 competitive events are scheduled for the area each year, with an average of 120 participants, but some attracting as many as 400, making Johnson Valley by far the most heavily used area along the proposed course. The Pisgah lava tubes, in contrast, are a low use attraction for spelunkers and receive at most a few hundred VUDs each year, representing the low end of the visitor use spectrum. Activities falling between these extremes are rock collecting (centered around the Ludlow area), occasional weekend use of the Cadiz Dunes for ORV play, sightseeing at Patton's Camp by World War II history buffs and recreational exploration of old town sites and mines in the area.

SOCIAL AND ECONOMIC FACTORS

The proposed action would take place in San Bernardino County which has a population of approximately 834,000 people. Most of these people reside in the western portion of the county which is part of the heavily populated Los Angeles basin. The nearest incorporated city to the race course would be Barstow, 26 airline miles away from the start area. Barstow's population is 16,800. The population of other settlements in the vicinity of the course is:

Settlement	Population
Lucerne Valley (12 mi. from start area)	1,000
Ludlow (Pit 1)	75
Amboy	25
Cadiz (8 miles from the course)	50
Rice	7
Iron Mountain (3 miles form the course)	100
Vidal Junction (2 miles from the course)	21
Parker, Arizona (15 miles from the finish area)	2,500
Earp (Across the Colorado River from Parker)	300

The settlement of Parker is located on the Arizona side of the Colorado River and is largely dependent upon tourist spending. Major recreation pursuits at Parker are fishing and power boating. Water skiing and high speed boat operation attract many people from the metropolitan areas of Southern California, especially on holiday weekends such as Columbus Day in October. Another major visitor attraction in the area is the Parker "400" off-road vehicle race which takes place annually in February and draws several thousand people.

Chapter IV

Environmental Consequences

ENVIRONMENTAL CONSEQUENCES

This chapter analyzes the environmental impacts that would result from authorizing a point to point motorcycle race across approximately 235 miles of the southern Mojave Desert in October or November 1980. It further assesses environmental consequences of that proposed action were it to become an annual event.

The proposed action, as described in Chapter II, is to permit a point to point motorcycle race this fall with the possibility that it will become an annual event. The proposed course runs approximately 235 miles starting in the Johnson Valley Open Area and ending at the start/ finish area of the Parker SCORE "400" race course.

CLIMATE AND AIR QUALITY

Production of airborne dust in excess of the California 24-hour standard for total suspended particulate matter (TSP) was universally observed for five ORV events at various locations in the California desert (Giroux, 1979). According to the same study the impact of ORV generated TSP depends upon several soil characteristics, dispersive meteorology and the number and types of vehicles. Though varying soil characteristics exist along the proposed race course and dispersive meteorology for the date of the race is unpredictable, it can be assumed that the proposed action would produce airborne dust in violation of the TSP standard.

The primary recipients for the air pollutants generated by a motorcycle race would be the race participants and support crews. Impact of TSP to the health of recipients would depend upon individual susceptibility and the physical, chemical and biological characteristics of the suspended particles.

Particles in the size range of 0.1 to 1.0 micron have a particularly significant adverse impact on the human respiratory system (Manahan, 1975). Larger particles are likely to be retained in the nasal cavity and pharynx. Smaller particles, however, may be transported to the lungs. Particles or their soluble components may enter the circulatory or lymphatic system through the lungs or the gastrointestinal tract. Eventually material may be transported to organs and could cause adverse effects to them.

The biological characteristics of suspended particulate matter can create adverse impacts ranging from allergies to disease. Coccidioimycosis (Valley fever) may be contracted by individuals exposed to dust at various origins, including the general area of the proposed action.

The significance of Coccidioides is indicated by the fact that in 1975 over 20 valley fever related deaths occurred in Arizona (Leathers, 1977). More commonly the disease is not fatal and exhibits mild symptoms such as tiredness, aching, sore throat or there may be more serious effects such as skin rashes or chronic lung disease (Loofbourow and Pappagianis, 1971).

Airborne particles produced by the proposed action would have an effect on air visibility. Impairment of visibility by dust plumes is controlled by particulate matter concentration and the size of the dust particles (Hagen and Skidmore, 1977).

The impairment of visibility by a dust plume is a function of the optical properties of the suspended particles, visible light and the background being viewed. The magnitude of visibility reduction which would result from the proposed race cannot be predicted.

The impairment of visibility may be a safety problem at some of the road crossings. Flagmen will be located at each crossing and safety procedures stipulated by the State and County will be implemented.

Cumulative Impacts

Dust from an ORV event could be spread as far as 5 miles downwind from the source and last for two days after the event (Giroux, 1979). The impacts would be cumulative insofar as the proposed action could be a recurring event. The potential for soil erosion might increase if the soil surface would be impacted by the occurrence of several races. Increased soil erosion would add some degree of dust production.

SOILS

Soil compaction would be substantially increased along portions of the route if the event were run annually. Even though a single race may not cause large increases in soil compaction, especially if run on dry soil, the compaction would be long lasting and subsequent races, some of which would undoubtedly occur on wet soil, would each add additional compaction. Increases in soil compaction outside of the Johnson Valley Open Area would be greater in the four pit areas and along segments of the course which are not on existing roads and trails. The pit areas may receive severe compaction covering an estimated 1 to 4 acres each which would result in a total of 4 to 16 acres of compacted soil. This estimate is based on sizes of comparable pit areas in aerial photographs. The off-road parts of the course on cohesive soils (about 50 miles) would compact to the greatest extent. If these tracked areas average 20 feet in width, a total of about 120 acres would be intensely impacted along these 50 miles. Some areas will compact to higher degrees than others (e.g., loamy soils will compact more than cohesive sands or clays), but compaction of all areas would reach such high values after years of races that plant growth on the compacted soil would be reduced and a highly visible strip of race course would be produced.

If vehicles are driven across the course every year, plant growth would be reduced along the strip whether the soils were compacted or not. Soil compaction along the approximately 9 miles of the course on cohesionless sands (e.g. dunes or washes) would be much less. Some compaction may occur in portions of washes but virtually no compaction would occur on dunes. Segments of the course on existing roads would not significantly increase the high existing compaction. "Whoop-dee-doos" (washboarding) on the roads would be increased.

The course through WSA 304 A crosses 14 miles which have been previously disturbed. Annual races would create a visible strip of compacted soil.

Wind and water erosion would be increased as a result of the event. Most of the event is on relatively level areas so increases in water erosion generally should not be substantial. Eckert, and others, (1977) studied effects of off-road vehicles on infiltration and sedimentation on two sites in Nevada. Tracks created by a single pass of a motorcycle or truck had similar rates of infiltration and sediment production compared to undisturbed areas when tested with an artificial rainfall simulator. Twenty passes with a truck or 50 passes with a motorcycle generally caused a reduction in infiltration capacity and an increase in sediment production. The runoff water and sediment from the area around the infiltration plot generally collected in low parts of the space between shrubs. Therefore, it was concluded that runoff and sediment from large off-road vehicle events on gentle slopes, even at high rates of rainfall, probably would not move off slope. Steep slopes are crossed by the race course west of pit area #3 on the margin of the Iron Mountains. Here, some of the slopes are composed primarily of rocks so disturbance will not result in substantial increases in water erosion. Other slopes in the area, however, are erodible and considerable accelerated water erosion may occur or some parts of the western side of the Iron Moutains. Increases in water erosion from the track suface would cause much smaller decreases in growth of vegetation along the course than direct vehicle impacts on plants or through soil compaction.

Increases in runoff from compacted soil such as road sufaces, may often cause increases in productivity along road margins (Johnson, and others, 1975). Similar accumulations of water may occur along the margins of the compacted race course. The spreading of the vehicles along the margins of the course would probably reduce the vegetation by direct impacts in the area which might otherwise have increased vegetation by this "water harvesting."

After disturbance along the course, wind erosion would occur at a higher rate until there is significant rainfall or until removal of fine particles produces a surface protective layer of coarse fragments. Dunes and washes would have very small increases in accelerated wind erosion after disturbance because wind erosion threshold velocities for both disturbed and undisturbed dunes and washes are typically very low (Gillette and others, 1979) and undisturbed threshold velocities are only slightly higher than disturbed values. Wind erosion would depend to a considerable extent on erosion fetch (length of continuous soil disturbance). Rate of wind erosion per unit area would increase to a maximum width distance because much of the erosion results from saltation grains would occur with distance downwind in loose soil until a maximum value is reached. Strong winds blowing parallel to the disturbed course would cause greater amounts of wind erosion than winds across the track because of the importance of erosin fetch. Wind erosion from the course would have a much smaller effect on productivity of vegetation than direct vehicle impacts or soil compaction. Wind erosion will cause some increase in total suspended particulates (see air quality section). Limitation to wind erosion and dust emission would occur because (1) of the narrow corridor of soil disturbed (limiting erosion fetch and total eroding area), (2) the coarse nature of much of the surface soil (reducing the amount of finer, erodible particles which would be lost) and (3) the one-year interval between disturbances which would allow restablilization by rainfall or coarse suface material.

Areas with very high potential for dust emission include silty soils on playa margins and underlying some well-developed desert pavements (mostly on dissected and higly dissected aluvial fans). Wilderness Study Area 304 A contains areas with high concentrations of silt which may produce large amounts of cohesionless sand (e.g. washes and dunes). Sand-covered alluvial fans, sand covered dissected alluvial fans, and sand covered plains would also produce small amounts of dust.

The off-road portions of the public comment alternative comprises approximately 54 miles on cohesive soils. These soils would compact to the greatest extent. If these tracked areas average 20 feet in width, a total of approximately 130 acres could be substantially compacted. This compares with about 50 miles and approximately 120 acres with the proposed action. A portion of this public comment alternative runs through the Kilbeck Hills. Here the topography is such that the potential for accelerated erosion exists. This alternative would avoid, however, the west side of the Iron Mountains which was identified as an area along the proposed course also having potential for increased erosion resulting from the proposed action.

In conclusion, a relatively small difference in impact to soils between the proposed action and the public comment alternative is anticipated.

VEGETATION

General Impacts

The impacts to vegetation from ORV activity have been subjected to numerous field studies (Davidson, 1973; Gibson, 1973; Keefe and Berry, 1973; Davidson and Fox 1974; BLM, 1977b). Based on these and other studies, the impacts to plant communities in areas of heavy disturbance can be briefly summarized. These impacts include: (a) reductions in density and the number of plants in a given area; (b) reductions in diversity by selective damage to the more fragile species; (c) impairment of vegetative growth and seed germination due to soil compaction; (d) degradation of soil biota; (e) depletion of scarce organic matter; and (f) an increase in the range and density of "weedy" invader species. Another long-lasting effect is the indirect effect of damage to soil through soil compaction (BLM, 1977b).

On Map 4.1, Anticipated Vegetative Impacts, the proposed and alternate courses (not including Johnson Valley Open Area) are divided into three categories of expected vegetative impacts. These categories are as follows:

(1) Light impact expected. These are sections of the course with well-established roads or trails where it is required that race participants stay within the road perimeter.

(2) Moderate impact expected. This category includes sections of the course that follow established roads or trails, but have no distinctly deterring barriers to the adjacent land. Little traffic is expected off the course. Much vegetation is found within the perimeter of these roads and would be impacted by many motorcycles.

(3) High impact expected. This category includes sections of the course without a defineable route of travel (i.e., washes, old tank tracks and open terrain).

Summary of Anticipated Impacts on Vegetation

The following categories are displayed on Map 4.1.

Category 1--Light impact expected.

1A, 1B, 1D, 1F, 1G. These segments follow well-maintained roads. The course runs through desert pavement and alkali flats which would deter racers from getting off the course. Very little impact is expected on the adjacent vegetation.

1C. The course follows the railroad frontage road. This segment follows extensive stretches with vegetation disturbed from railroad and telephone line maintenance crews, and from ORV usage. Any race related impacts would be impossible to assess.

1E. The gasoline road is poorly maintained and many pioneer species are found on the road surface. The gas company could grade this road at any time thereby destroying all the adventive growth.

1H. This is a section of the Parker 400 race course and new impacts would also be impossible to assess.

Alternate 1I (Patton's Trail alternative). This segment has been deleted from the (revised-due to public comment) Patton's Trail alternative.

Category 2--Moderate impact expected.

2A. This section of the course follows the telephone line road north, then turns east on an old mining road. Both roads are marginal with no natural barriers to prevent straying from the marked course. Moderate damage to vegetation in the adjacent areas might be expected. There are many plants within the perimeter of the old roads and cutting of sharp corners could occur.

2B. There is no definable trail other than the wash itself. The race should cause moderate impact through this section.

2C. The course does not follow a road or trail through this section. This section crosses areas that appear to have been heavily disturbed, probably by previous military activities. Moderate impacts would be expected because the course runs cross-grain (perpendicular to drainage patterns). Creosote scrub vegetation could be damaged by racers weaving as they try to choose the best line of travel.

2D. This segment follows a fairly well established jeep trail through lava flows in the Amboy lava flows. The course mostly follows the path of least resistance, but there are numerous sharp turns and switch-backs which would lead to short cutting, and thus, moderate impacts on the vegetation in certain locations.

2E. This section passes through creosote shrub around the Amboy lava flow and into the alkali sink habitat of Bristol Dry Lake along a series of small washes, faint trails and open land. The vegetation is moderate through this section and vegetative impacts should be moderate.

2F. Here the course follows a pole line road that is transected by numerous county maintained water diversion ditches. Some of these ditches could force riders off the road and into adjacent vegetation or out onto Amboy Road. Moderate impact is expected if the riders stay on the pole line road.

2G. This segment also follows a pole line road. The upper third of this section comes down a steep bajada, so the racers would be traveling at moderate speeds and probably adhering to the road. There is a clump of Coryphantha vivipara var. alversonii, a CNPS-listed rare species, within ten feet of the course centerline. The lower two-thirds of this section crosses partially stabilized dunes and sparse creosote habitats. The possibility of straying from the course would be moderate in these areas; impacts would also be moderate. The Coryphantha would be protected by barriers.

2H. This segment crosses mostly visibly undisturbed desert. Numerous, moderate sized creosote rings were observed adjacent to the course.

2I. This segment follows a system of roads and jeep trails paralleling the Cadiz Valley Sand Dunes. Because of the loose, sandy nature of the soil, travel would be fastest on the somewhat compacted (and recently graded road. Straying from the course is possible, but not too likely. The adjacent creosote rings would be protected by course marking.

2J. This segment around the north side of the Iron Mountains follows old trails and washes. There is much perennial vegetation within the perimeter of the trails. Moderate impact is expected along the trails.

Alternate 2K. This part of the Patton's Trail alternative runs south on Patton's Trail to where the road is maintained. There would be moderate impact on vegetation within and adjacent to the trail. Many plants are well established within the road boundary.

Category 3--High impact expected

3A. This segment of the course is in enriched desert shrub. This segment is sensitive because it is the most diverse plant community on the proposed course. Two CNPS rare plants, Cynanchum utahense, and Pholisma arenarium (see Rare and Endangered Plant Species, below) were observed here.

3B. This is a short segment to the south of the Pisgah lava flow. Due to a large number of sharp turns and the possibility of cutting across corners, this segment should receive high impacts.

3C. This is an 8.5 mile section of undisturbed desert south and east of Ludlow. Approximately half of this segment is within desert dry wash where the impacts would be moderate. The other half, crossing the washes at right angles, is susceptible to the creation of many trails. The impact to the vegetation would be high through this area. The major impact would be the creation of an established track largely devoid of vegetation. Lesser effects such as alteration of normal diversity and densities of vegetation adjacent to the course could also occur. The establishment of a well defined track is an assumed effect of 800 motorcycles passing over a course in undisturbed desert. The impact on adjacent land along the course would be directly dependent upon how well the racers adhere to the marked course. One rare plant, Coryphantha vivipara var. alversonii, was found in this segment. A rock cairn has been constructed to deter running it over.

3D. This segment of the course crosses mostly visibly undisturbed desert. Impacts in this section would be high because a race would establish a new road and many plants would be destroyed or damaged in the process.

3E. This would probably be the most impacted segment of the proposed course. The course follows the 1973 Check Chase route along the western edge of the Iron Mountains, passing up and over a number of ridges. Impacts to soil and vegetation from past use is still quite evident on the steeper slopes and additional impacts should be expected.

Four pit areas are proposed. They are to be no more than 4 acres each and would be cordoned off with no activity outside their bounds permitted. Impact to vegetation inside the pits is considered to be virtually total. Impact to adjacent vegetation depends upon the adequacy of compliance. However, pit areas 1, 2, 3, and 4 of the proposed course and pits 2 and 3 of the alternatives are nearly devoid of vegetation (due to either previously incurred impacts or natural sparseness) and, therefore, any additional impacts may be considered negligible.

Rare and Endangered Plant Species

Observed Plants

Coryphantha vivipara var. alversonii, both plants observed were within 20 feet of the flagged course centerline and both would be in the position to be damaged or killed by motorcycles straying from the course. Steps will be taken to avoid damaging them. Segment 5 of the public comment alternative avoids one of these areas. A rock wall was built to protect the other.

Cynanchum utahense, a small perennial, was within the race corridor (20 feet from the course centerline). Impact to this plant would be unlikely because it is on a rise where racers would be unlikely to go.

Pholisma arenarium, a parasitic annual, will have died by the time of the event (the vegetative portion of P. arenarium was observed during late spring and early summer). Impact would be expected, only if the race were held during wet weather or during spring months. Segment 1 of the Public Comment Alternative avoids the wash. Where this and the Cyanchum are located.

Unobserved Plants

Other plants of the observed species, as well as other species included in the rare and endangered plant list presented in Chapter 3, could be impacted, directly or indirectly, by habitat damage or destruction.

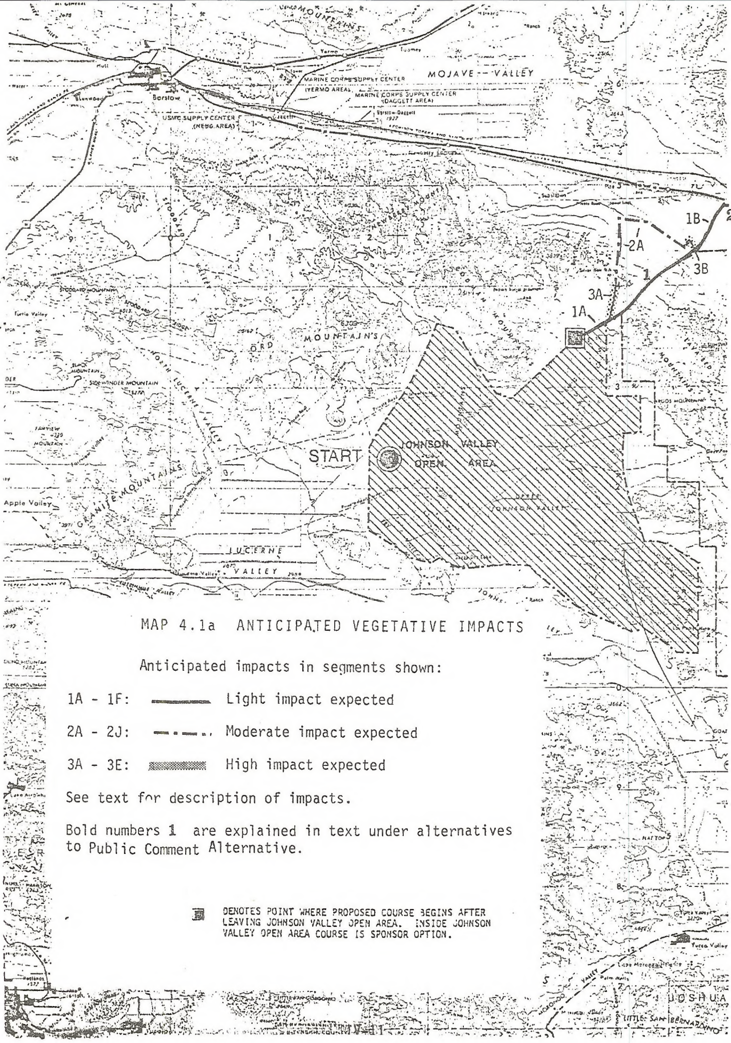
Unique Vegetation

Impact on the unique vegetative communities mentioned in the "Unique Vegetation" section of Chapter 3 are covered in the Summary of Anticipated Impacts on Vegetation above, in Categories 3A, 3H, and 3I.

The information on specific creosote rings in the areas adjacent to the race is quite limited. Some small rings would be within the impacted area. Impacts should be slight.

Cumulative Impacts

Damage would be incurred if one race were permitted, especially on undisturbed land. Some vegetation would be damaged or lost. If the disturbed areas were not reused, recovery would take place gradually as crushed shrubs would resprout from root crowns (Vollmer, et al., 1976) and annuals will fill in as ground cover. However, if subsequent races are run over the same course, damage would increase. Resprouting shrubs would be further damaged or destroyed and there would be additional compaction and erosion of soils. With repeated races the potential for damage or death to individuals of rare and/or endangered plant species would increase.



MAP 4.1a ANTICIPATED VEGETATIVE IMPACTS

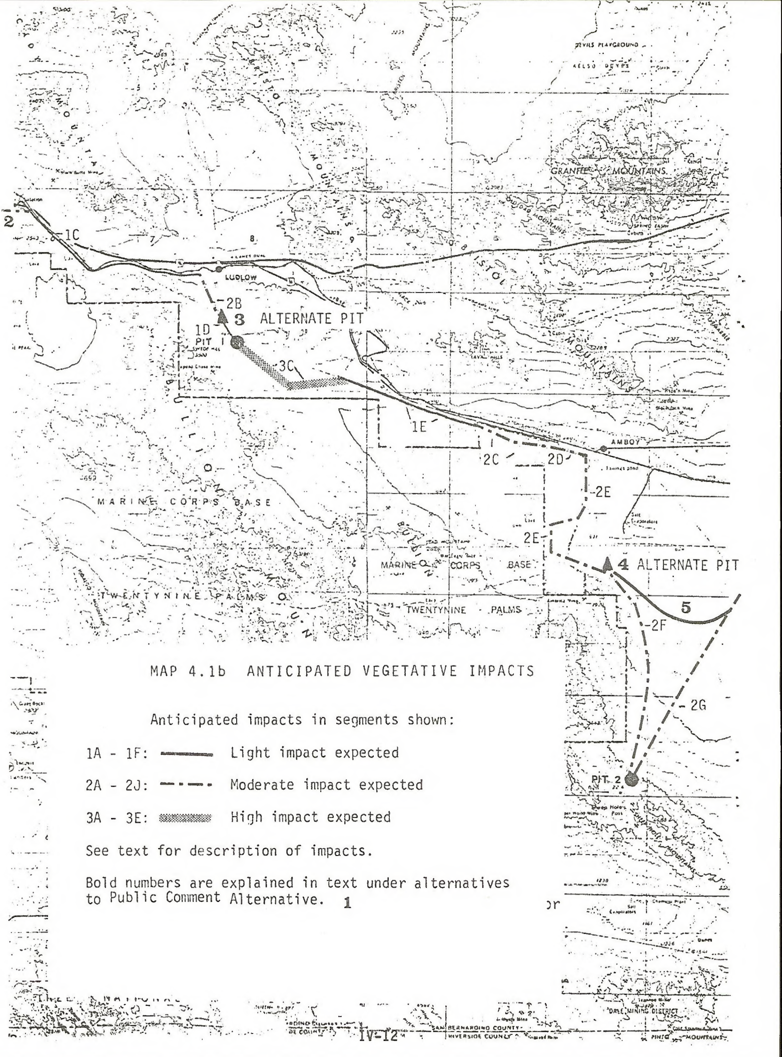
Anticipated impacts in segments shown:

1A - 1F:	▬▬▬	Light impact expected
2A - 2J:	▬ · ▬ ·	Moderate impact expected
3A - 3E:	▒▒▒	High impact expected

See text for description of impacts.

Bold numbers **1** are explained in text under alternatives to Public Comment Alternative.

▣ DENOTES POINT WHERE PROPOSED COURSE BEGINS AFTER LEAVING JOHNSON VALLEY OPEN AREA. INSIDE JOHNSON VALLEY OPEN AREA COURSE IS SPONSOR OPTION.



MAP 4.1b ANTICIPATED VEGETATIVE IMPACTS

Anticipated impacts in segments shown:

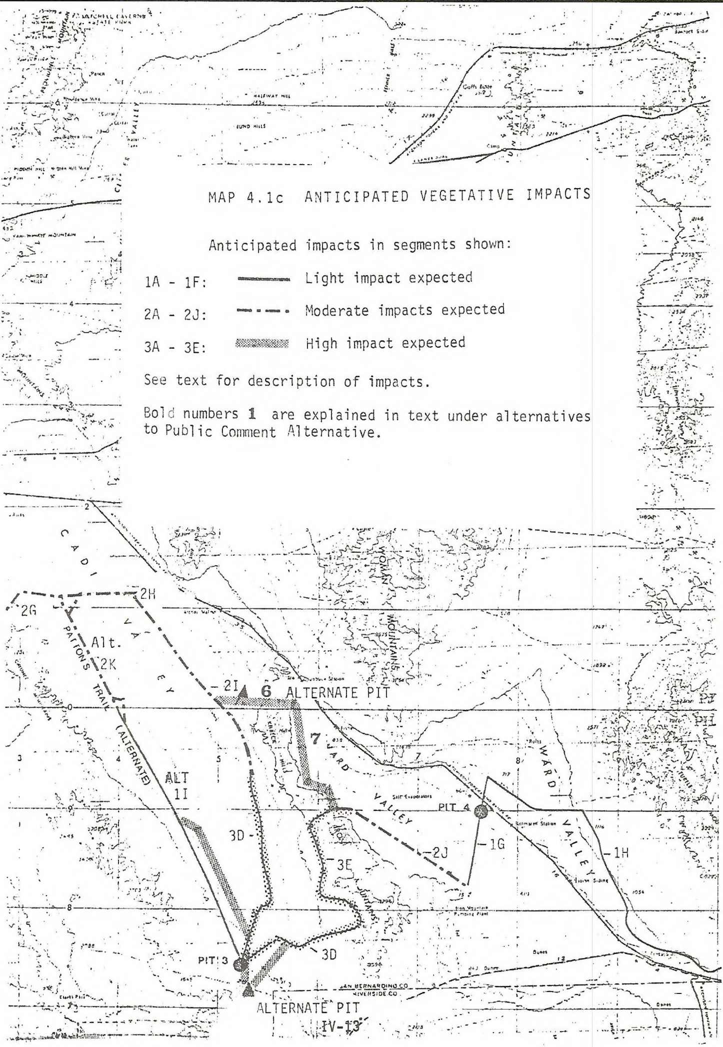
1A - 1F: ——— Light impact expected

2A - 2J: —·—· Moderate impact expected

3A - 3E: ▨ High impact expected

See text for description of impacts.

Bold numbers are explained in text under alternatives to Public Comment Alternative. **1**



MAP 4.1c ANTICIPATED VEGETATIVE IMPACTS

Anticipated impacts in segments shown:

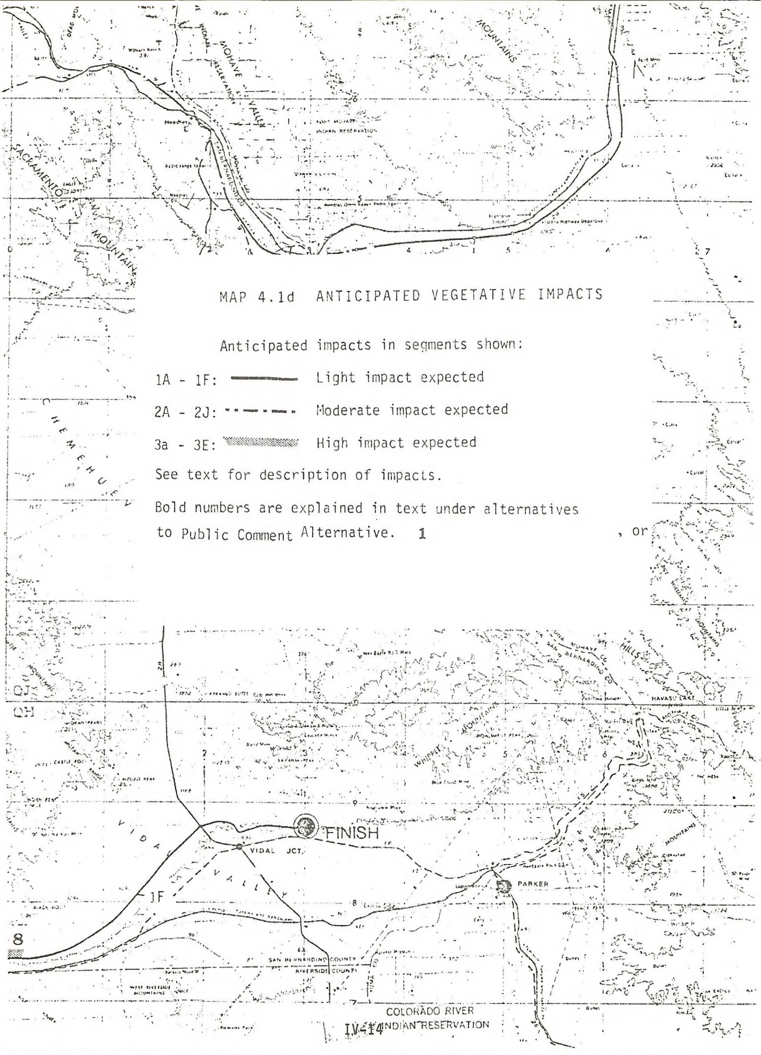
1A - 1F: ─── Light impact expected

2A - 2J: -·-·- Moderate impacts expected

3A - 3E: ▨▨▨ High impact expected

See text for description of impacts.

Bold numbers **1** are explained in text under alternatives to Public Comment Alternative.



MAP 4.1d ANTICIPATED VEGETATIVE IMPACTS

Anticipated impacts in segments shown:

1A - 1F: ——— Light impact expected

2A - 2J: -- — -- Moderate impact expected

3a - 3E: ▨ High impact expected

See text for description of impacts.

Bold numbers are explained in text under alternatives to Public Comment Alternative. **1** , or

Patton's Trail Alternative (revised)

The following changes have been made to mitigate objections along this route:

1. The north 1.9 miles has been rerouted to avoid the high speed segment of the road. The change will go through the adjacent creosote/bursage habitat on an existing trail. Vegetation will be damaged through this segment. Moderate impact is expected.
2. This 1.6 mile segment leaves Patton's Trail to the east to avoid a private parcel. Moderate impact is expected as open terrain is crossed.
3. This segment (Piccadilly Lane) is the longest and would probably be the most damaging to existing vegetation of this alternative. Dry wash and tank tracks were used as much as possible. The segment has a high concentration of vegetation and high impact is expected. Pit 3 would be relocated to the south on an old airstrip, which is largely denuded of vegetation.

Public Comment Alternative

There are eight (8) individual changes incorporated into this alternative. Each segment was surveyed in a similar manner as previously described. Plots have been established to monitor any impact.

1. This is a continuation along a powerline road where light impact is expected. It avoids a wash where two species of rare and endangered plants were found.
2. This change would be along Highway 66 in a dunes complex with many annuals and scattered perennials. Moderate impact is expected.
3. This relocated pit 1 is largely devoid of vegetation. Light to moderate impact is anticipated.
4. This change moves pit area 2 from Sheephole Pass to the injunction of Amboy Road and the south side of Bristol Dry Lake. The vegetation is sparse alkali flat. No rare plants were found. Impact is expected to be light.
5. This change would run along the southern periphery of Bristol Dry Lake through alkali vegetation. No rare plants were encountered but impacts are expected to be moderate as this segment is roadless. It avoids one of two spots on the course where Coryphantha vividala val. aluersonii was found.
6. This change would relocate pit 3 along a mine road west of the Kilbeck Hills. Light impacts would be expected as the relocated pit would be on an existing road.

7. This change would follow minor trails, washes, and dunes. High impact would be expected because most of the area east of the Kilbeck Hills is without trails.
8. This is a relatively small change to avoid a privately-owned section along the Parker 400 course. No rare plants were found and light impact is expected.

WILDLIFE

The proposed action would affect wildlife in two ways - indirectly through loss and deterioration of habitat and directly through losses to animal populations. Losses to wildlife habitat occur with disturbance and damage to soils and vegetation. Wildlife populations depend directly and indirectly on vegetation for food, cover, nesting, burrowing, for territorial boundaries and for other aspects of existence. Vegetation is the basis of all food chains and damage or loss of vegetation sets off a complex but predictable series of related events. A reduction in primary producers)plants) decreases the carrying capacity and available nutrients and energy for transfer to consumer species (primary consumers) effectively causing a reduction of their numbers. Secondary and tertiary consumers (predators) in turn must sustain reductions as they are directly dependent upon the lower trophic levels. The effects are generally magnified at the higher trophic levels and an overall decrease in stability and diversity of communities is realized.

Direct mortality and/or injury to some animals would be anticipated during the course of the proposed event. In late fall (October - November) many reptiles and small mammals would be hibernating underground. Other nocturnal species spend their daylight hours beneath the surface. In addition to direct mortality or injury to those animals above ground, numerous others would sustain injury or death while quiescent in their underground retreats. Those not injured or killed might subsequently be subjected to increased physiological stress or death due to exposure or predation since their burrows and homesites would no longer be available.

It should be stressed that the above-described impacts pertain largly to those portions of the proposed course which are presently roadless or lacking in definable routes of travel as well as pit areas and start/finish areas. In such areas of heavy use or anticipated heavy impact, populations of reptiles and small mammals have been shown to undergo marked declines in numbers (up to 90 percent reductions) and species diversity (Busack, 1973; Byrne, 1973; BLM, 1975; Bury, and others, 1977). Impacts of this caliber may be anticipated at the start area of the proposed course, the four pit areas and the finish area. All of these areas, particularly the start and finish areas, are substantially impacted already.

Impacts to wildlife habitat and populations along exisiting roads and trails, especially well-defined roads, would be minimal. However, those portions of the proposed course not on existing roads and trails may be expected to sustain significant impact in terms of loss of habitat and individual animals. Since no definable route of travel exists in some of these areas, a fifteen to twenty foot wide swath, largely denuded of vegetation, may be expected to be created over the portions of the course identified as being roadless (Table 2.1). This computes to over 40 acres of intensive impact to previously undisturbed habitat. Animal populations within these areas may be expected to decline in numbers. The same holds true for roadless areas with existing tank and ORV impacts but not to the same degree.

Although judged to be minor in degree, collection, harassment and vandalism to diurnal, above-ground species on the day of the proposed event would be an additional impact to wildlife which must be taken into account. Such activities would occur only at start/finish and pit areas.

Significant Species

This discussion includes BLM (nominated) sensitive species and other significant species identified in Chapter 3 (no Federal or Statelisted species occur within the affected area). The majority of species in this category are either predators or species limited in numbers (or distribution) due to restricted habitat. The proposed action would in some areas reduce populations of reptiles and small mammals. This in turn would be felt up the food chain as there becomes less available prey animals for raptors, carnivores and other predatory forms, many of which are either sensitive or significant. Among the more important species to be affected would be the golden eagle, Swainson's hawk, marsh hawk, prairie falcon, American kestrel, loggerhead shrike, long-eared owl, short-eared owl, barn owl, burrowing owl, kit fox, coyote and bobcat. More direct impact would occur in the form of habitat degradation or destruction and direct mortality or injury to species such as the desert tortoise, Mojave fringe-toed lizard, western shovel-nosed snake and desert kangaroo rat along portions of the course expected to receive substantive impacts (start/finish, pit and roadless areas).

Significant Habitats

Desert dunes and sandhills are extremely productive following wet winters, such as the past three years have been. High densities and diversity of annual species are often displayed following such periods of precipitation and this in turn is reflected in population numbers of small mammals and reptiles. Unusually high densities of desert kangaroo rats were recorded along the portion of the proposed course running east of Cadiz Dry Lake (in the sand hills peripheral to the Cadiz Dunes). These high densities, which are four to five fold greater than recorded three years ago (BLM, 1977b), reflect the abundant winter precipitation and increased productivity of the past three years. This segment of the course is approximately 45 percent (about 15 miles) roadless (primarily in the southern half) and without definable routes of travel. If 800 motorcycles were to run though such areas, significant impacts to vegetation, wildlife and wildlife habitat may be anticipated. Many of the scars would soon be erased due to the loose, sandy nature of the substrate; however, much vegetation and habitat would be damaged or destroyed along with animal burrows and nests. Sandy areas presently vegetated would lose some of that vegative cover and stability with subsequent tendencies toward dune formation. Such dunes would be less productive due to the loss of vegetation, increasingly susceptible to wind erosion and lack of stable burrowing substrate. Wildlife species particularly susceptible include the desert and Merriam kangaroo rats, round-tailed ground squirrels, Mojave fringe-toed lizards, horned lizards, black-throated and Brewer's sparrows as well as other seedeating birds.

The Cadiz Dunes (and surrounding sand hills) are probably the most significant and sensitive portion of the proposed race course relative to wildlife resources and would sustain substantial impacts if the proposed action is implemented. The Patton's Trail alternate segment is a continuous, well-defined road. Impacts on wildlife resources would be considerably reduced (by avoiding sensitive and important habitat) if the proposed event were to run on Patton's Trail.

The desert dry wash is another important habitat for wildlife in the desert. Because of the increased vegetative diversity and biomass, animals, especially many species of birds, concentrate in washes. This is particularly true of larger washes with tree vegetation. The proposed course runs through at least five washes (over 10 miles) and crosses numerous others including large, palo verde/ironwood washes along the Parker 400 leg (BLM, 1979a). Most wash vegetation is treelike (catclaw, smoketree, desert willow, palo verde, ironwood, tamarisk) and large enough that riders would avoid them (BLM, 1975). Hence, the impact to wash habitat (tree-like vegetation) would be generally not great. Scars from motorcycle tracks on the sandy wash bottoms would easily heal with subsequent rains, although the banks (where many animals burrow) would often be heavily degraded. Perhaps the greatest impact to the fauna (especially birds) of desert dry wash habitats would be disturbance. Birds would be very easily disturbed and would receive a high, but short-term and localized impact on the day of the proposed event. No species are expected to be nesting in October or November but migrants, including unusual visitors, may be expected to be disturbed on the day of the event.

Other wildlife habitats identified along the proposed course are not sufficiently sensitive or significant to warrant further discussion. See Table 4.1 for a rating of the relative impacts on various habitat types.

Cumulative Impacts

Damage would be incurred from one race or one event on undisturbed land. Vegetation would be damaged or lost, soils disturbed and compacted, and wildlife populations disturbed with loss of some animals. If the disturbed areas were not re-used, recovery would take place gradually. Crushed

TABLE 4.1

RELATIVE IMPACTS ON WILDLIFE HABITATS

Habitat Type	Criteria 1	2	3	4	5	Relative Impact
Playa					X	Low
Playa Edge					X	Low
Dunes/sandhills		X	X	X		High
Creosote Flats		X			X	Low
Creosote/bursage		X			X	Low
Desert Dry Wash		X		X		Moderate

*Criteria:
1. Presence of federally listed Endangered/Threatened species and/or state listed Endangered/Rare species.
2. Presence of BLM (nominated) sensitive species or other significant species.
3. Uniqueness or rarity of the habitat or associated plant community.
4. Unusually high diversity of density of species.
5. Unusual susceptibility to disruption or slow recovery potential.

*The above criteria are weighted; the lower the number, the greater its importance.

CULTURAL RESOURCES

Cultural resources are either avoided or are impacted. The course was rerouted to avoid three sites and is now at least one quarter mile from them. Isolated artifacts located in single (solitary) flaking stations or pottery scatters were mapped, photographed and collected. Single features like rock alignments were mapped, sketched and photographed.

Direct Impacts

Cultural resources -- typically fragile, unique and non-renewable-- are subject to a variety of adverse impacts. Direct impacts on cultural resources generated from the participants would be limited primarily to the race course and pit areas. Direct impacts on cultural resources would result from vehicles passing directly through and over the resources causing disruption, breakage and spatial displacement of artifacts of cultural features. It is assumed that any resource within the 200-foot-wide race course corridor in an off-road section could be subject to direct impact. For portions of the race course route which follow graded roads, it is assumed that direct impacts would be confined to any resources within the road itself.

Indirect Impacts

Indirect impacts would not be caused by a single race itself but by any increases in land use and visitation to the region. Indirect impacts would be associated with the activities of spectators, campers and any increase in non-race associated off-road vehicle activities. Off-road vehicle use by some spectators seeking vantage points outside the start and finish areas could result in disturbance to cultural resource sites. Generally, the greater the exposure of cultural resources to the public, the greater the potential for illicit collection and vandalism.

In contrast to direct impacts, indirect impacts may occur anywhere in the area of the race course route, and the precise nature and intensity of these impacts is difficult to predict. It is assumed that indirect impacts would occur on cultural resources in the vicinity of the race course route. It is probable that resources most affected would be those with high visibility, such as feature-bearing historic resources like Ragtown (near pit area 1).

Cumulative Impacts

Race corridors tend to widen out and deepen with repeated running of races over the same route. Where the corridor passes through an archaeological site, the widening and deepening effect would result in both displacement and breakage of artifacts and features in both lateral and vertical directions. This damage would become more severe with repeated driving over a site.

However, cumulative impacts on cultural resources would be greater if the location of a race course were changed from event to event. This would be so because changing the location of a course would increase the possibility of destruction of new sites whereas, by using the same course, the number of sites to be impacted would be limited.

On the other hand, as participants become more and more familar with a course through repeated use, they might take advantage of shortcuts in areas where no clearance has been made. Inadvertant crossing of cultural sites and subsequent damage to the sites might result.

The Patton's Trail and public comment alternatives would affect no newly recorded sites, while they would avoid three sites located nearby the proposed course. Only one site has been recorded on the public comment alternative upon which potential impact could occur - 4-SBr-1905 - and this site appears to be naturally protected by a hill.

NATIVE AMERICAN CONCERNS

Native Americans contacted expressed the following concerns:

(1) Hare and Hound Start--The mass start as proposed in this type of race is extremely objectionable to the Native Americans. Their traditional regard for the land as being sacred and having to be treated with respect is still important in their present thinking. The destruction to both the plants and animals would be irreparable and the scars on "Mother Earth" could be seen for years. Native Americans feel the land would be unusable, and this is contrary to the values of reverence and dignity due the dieties of the earth.

(2) Smoke Target--In many desert races the target for the beginning of the designated trail has been burning tires to set up a smoke bomb. The Native Americans feel that not only has the smoke polluted the air, but many times burned rubbish has been left behind. They would like to see something else used (a smoke bomb would not be used for this event).

(3) Archaeological Sites--Any known sites along the course should be surveyed and flagged so they can be avoided.

(4) Vidal Junction End--The Colorado River Tribes expressed strong dislike for the race, especially since it would end so close to Parker. They feel that after other ORV events, spectators and racers have been rowdy and have carried that rowdiness into Parker where they have shown disrespect for the law. An event would require additional patrolling, which would be costly and would far outweigh the benefits of the race.

Native Americans feel this race would be an enormous waste of energy which would be a great cost for so few.

The area involved in the proposed race course is already receiving impacts by off-road vehicles as well as other activities. No additional impacts, other than those identified to other resources, would be expected to be caused by this one-day event.

VISUAL RESOURCES

Visual changes caused by an annual race would be minimal. Pitting areas are already impacted, and places where highways are crossed or where the course can be seen from highways are areas where the course follows existing routes. Nearly eighty percent of the proposed course is on exisiing routes or in obviously disturbed areas. After one or several annual races, no significant change should be evident. The remaining portions run through relatively undisturbed areas. Changes may be evident for a time after each race, but many of these course segments would seldom be noticed because of their remoteness. No visual changes would be expected that would exceed the limits for VRM Class II, the most stringent class that the race would go through.

The most sensitive visual area would be WSA 304 A. For a detailed analysis that considers visual elements, see the wilderness section, below.

WILDERNESS

In the analysis that follows, it is assumed that the course would on the average be 15 feet wide or restricted to the bounds of an existing route, whichever is narrower. The only wilderness study area that will be discussed in detail is WSA 304A, since the course passes through it for several miles. Wilderness Study Areas 207, 304, and 307 are not at issue, since the course does not enter them but merely uses roads that border them. The course technically falls within the bounds of WSA 304 for 3 miles but it follows a pole line right-of-way which is approximately 75 feet in from Amboy Road, the WSA's eastern boundary. The Public Comment alternative avoids WSA 304 altogether. WSA 305 is not entered, but merely bordered by the proposed course and alternatives. The National Outdoor Coalition has requested dismissal of their appeal directed against the designation of the western half of roadless area 305 as a wilderness study area. Because the eastern half of roadless area 305 is not under wilderness review, it is not subject to IMP guidelines and its use is not a wilderness issue.

Nonimpairment Criteria

For an event to be allowed through wilderness study areas, the BLM must show that wilderness suitability would not be impaired. The three criteria used in making this judgment (reproduced in complete form in Appendix E-2 and extracted from the "Interim Management Policy and Guidelines for Areas under Wilderness Review") are:

A. It would be temporary

The race would only be run one day each year over the part of the course going through WSA 304A and 305. If an area through which the course passes should be designated as wilderness by Congress, the race would be stopped or rerouted.

B. Any temporary impacts that would be caused by the activity must, at a minimum, be capable of being reclaimed to a condition of being substantially unnoticeable in the wilderness study area as a whole by the time the Secretary of the Interior is scheduled to send his recommendations on that area to the President.

Even if no action should be taken for reclamation, the disturbances an annual race would create would still be substantially unnoticeable in the WSA as a whole. According to the IMP definition, being substantially unnoticeable:

> Refers to something that either is so insignificant as to be only a very minor feature of the overall area or is not distinctly recognizable by the average visitor as being manmade or man-caused because of age, weathering, or biological change. An example of the first would be a few minor dams or abandoned or buildings that are widely scattered over a large area, so that they are an inconspicuous part of the scene. Serious intrusions of this kind, or many of them, may preclude inclusion of the land in and in a wilderness study area. An example of the second would be an old juniper control project that has grown up to a natural appearance, the old fallen trees largely decomposed (IMP, 1979).

The conclusion that the impacts of annual races would be substantially unnoticeable is based on the following observations:

(1) The noticeable changes created by one or more events would be restricted to tracks averaging 15 feet or less in width. For WSA 304A, this would mean that 18 acres not already obviously disturbed would be impacted, out of a total of 13,414 acres, or 0.13 percent of the entire WSA. The most frequented viewing areas in WSA 304A are at the base of the cone, and from the top. The course is not visible from either location. The only places along Highway 66 where the course is visible look into areas where the course uses existing routes. For these reasons, and because vegetation is already so sparse, the additional amount of disturbance should not be noticed.

(2) WSA 304 A has similar existing impacts that cover much greater areas than would be impacted by the proposed action. Segments 1 and 2 show examples of these impacts; existing ways in segment 2 would be used for the course.

(3) The proposed course follows as closely as possible routes used in the past for the Check Chase race. Practically no signs of impacts are still evident, implying a high likelihood of natural erasure of tracks segments.

(4) The nature of the terrain is such that visual changes would not be significant. Vegetation is sparse in all of WSA 304A, so a course would not create any noticeable new lines in the landscape.

C. "When the activity is terminated, and after any needed reclamation is complete, the area's wilderness values must not have been degraded so far ... as to significantly constrain the Secretary's recommendation with respect to the area's suitability or nonsuitability for preservation as wilderness" (IMP, 1979).

Considering the points already made, it is reasonable to expect that impacts would not degrade wilderness values of WSA 304A to the point where its suitability would be called into question. If disturbance generated by a race exceed expectations, future events would be denied or rerouted around the WSA, allowing natural rehabilitation to occur before the area's wilderness status is decided by Congress. If necessary, measures will be taken (such as using a tractor and harrow to 'rip' the soil, alleviating compaction; or restoring original contours with hand tools) to assure natural repair.

Cumulative Impacts

An important issue related to the question of impairment is whether the temporary impacts caused by an annual race would be enough to have dropped these areas from further consideration as a potential wilderness area if they had existed at the time of BLM's intensive inventory. Subsidiary to this is whether the addition of these impacts would produce an aggregate effect upon the areas' wilderness characteristics and values that would constrain recommendation of the areas as suitable for wilderness designation.

It is expected that 0.13 percent of WSA 304 A will be physically disturbed by a race. A 3.5 mile segment uses existing routes and the others are in terrain that can be restored relatively soon by natural and/or mechanical means. To avoid any unnecessary or undue disturbance, the course centerline through the WSA will be especially well-marked by lime to keep the area of disturbance to a minimum. Except where unusually dusty areas are encountered, or at turns, the course width (marked by blue flagging on both sides at 1/10 mile intervals or less) will be substantially less than the maximum allowable 50 feet for off-road areas. It is expected that the actual area of disturbance will average less than 15 feet in width. If the proposed course had been used immediately before the wilderness inventory, the disturbance, being so similar to those tracks already present in large numbers in the WSA, would likely not have made a significant difference in the inventory findings.

In conclusion, the proposed action likely would not impair wilderness values such that these area's recommendation by the Secretary of the Interior as wilderness would be constrained because of new disturbances. Unavoidable impacts would be the creation of ways that do not now exist, but that did exist recently. Cumulative impacts would not be so great so as to create a problem of suitability or nonsuitability. Based on the insignificance of the anticipated disturbances in the WSA as a whole, their substantially unnoticeable character and the degree of impact now present, there should be no irreversible or irretrievable commitment made of existing wilderness values.

RECREATION

Approval of the proposed action would allow resumption of a once very popular annual event. Although statistics gathered for the Desert Plan show a sharp drop in competitive events on public land in the desert over the last ten years, demand for permits has been rising again over the last year. Demand has remained high for a race on the proposed course. Denial of the application for this race would maintain the status quo so far as competitive racing is concerned.

Other recreational activities would be affected. However, the impacts to them should be very slight in part, because the duration of the event is very short (one day).

SOCIAL AND ECONOMIC FACTORS

It is estimated that 2,400 people would participate in the proposed race, either as entrants or family and support people. With an average stay in the area of two days, and expenditures of $20 per person per day, these people would spend about $100,000 in the area. Most of this spending would be expected to take place in the Parker area after the race.

If all of the people from the event were to go to Parker after the race, the population at Parker would be increased. However, some people would not go to Parker, and others would spread out along the Colorado River. The resultant traffic and partying would add to the normal weekend recreation-oriented crowds in the town. This would be an adverse impact to those residents who value a quiet atmosphere. It would, however, be similar to the activity which takes place during the Parker 400 race, and during weekends when large numbers of river-oriented visitors gather there. The benefitting portion of the community would be the merchants, their employees, and people who enjoy the partying atmosphere. This activity would be of the sorth that is the normal economic mainstay of the community. Civil authorities would be expected to be reinforced by assistance from the Yuma and San Bernardino County Sheriffs' Departments and the California Highway Patrol.

Though three small settlements lie along the course (Ludlow, Amboy and Rice),. all are at least a mile from the course. During the race, traffic through these communities would be substantially increased by the passage of support vehicles. Support crews may be expected to purchase some incidental items such as beverages from stores at these places. Such spending could constitute a large proportion of the business of stores in these small communities on a race day.

The safety of entrants and suppport crews is expected to be normal for an event of this nature. Since this would not be a spectator event, spectator safety is not expected to be a significant factor. The safety of residents of communities near the race course would be adversely impacted by the increased traffic of support vehicles. This traffic is expected to be controlled by Sheriff and Highway Patrol officers consistent with the State Vehicle Code.

UNAVOIDABLE ADVERSE IMPACTS

Proposed Action

Certain adverse impacts would be unavoidable in spite of mitigation. Dust would be created as well as increases in oxidant and carbon monoxide levels from race vehicles. Increases in blowing dust would persist subsequent to the event with the resulting effects on local air quality depending largely on climatic conditions (wind and rain). The increase in dust would likely violate the 24-hour concentration standard for suspended particulates.

Surface conditions of soils, notably in undisturbed areas, would be disrupted by the tracks of motorcycles. Topsoils would be pulverized and many soils would be compacted, especially if the ground is wet. As a result, productivity would decrease. Situations would be created on slopes which promote erosion. Where the course crosses washes, banks would be broken down causing potential for erosion and down-wash sedimentation.

The uncommon noise levels generated by motorcycles as they collectively traverse the course would briefly but intensely disturb the solitude of the natural environment. Noise levels at any given point along the course would increase from near total silence to very loud levels for a relatively short duration. This could cause temporary, even permanent auditory injury (and possible subsequent death) to certain resident animals. Noise intensity would be expected to be greatest at the start area and earlier portions of the course and gradually diminish in intensity as riders decrease in number and become more and more dispersed.

Unavoidable adverse impacts on vegetative resources would occur primarily along portions of the course without well-defined roads. These impacts include a reduction in the total number and diversity of native perennial and annual species, reduction in canopy cover of individual perennial shrubs, increased growth of invader "weedy" species, decreased primary productivity and impairment of plant growth resulting from direct injury, soil compaction, increased dust and degradation of soil life forms. The overall effect on botanical resources in these areas would be a reduction in the diversity and size of populations of native species. Recovery of natural, climax vegetation is generally quite slow (often decades) in desert environments and impacts would therefore be long-lived.

Unavoidable adverse impacts on wildlife resources would be directly allied to impacts on vegetative resources. Decreased plant diversity, productivity and population size negatively affects those species of wildlife directly dependent upon the vegetation for food, cover, shelters and nest sites. These same consequences would be passed up the food chain with a magnified effect upon the top consumers. The overall effect would be a reduction in diversity and numbers of resident wildlife populations particularly along those portions of the course without well-defined roads (where habitat damage would be greatest). In addition to habitat degradation, direct disturbance, injury and/or mortality to animals, above and below ground, could be expected to occur.

Off-road vehicles, dust and noise would constitute a brief but unavoidable intrusion on scenic/visual resources of the areas. The cumulative effect of repeated impacts on surface and vegetation features would cause minor intrusions to visual integrity.

Wilderness Study Area 304 A is already impacted by existing tank and vehicle tracks and several refuse dumps. Running a race through this WSA would unavoidably and adversely disturb additional surface as well as other resources; however, this impact should not impair wilderness characteristics.

Adverse impacts upon nonvehicular-oriented recreation, although short-term in duration, would be unavoidable but of minor consequence as the areas along the proposed course receive little recreation of this type.

Patton's Trail Alternative

Environmental consequences to resources previously described would also occur under this alternative, however, the portion of the proposed course omitted under this alternative would be excluded from that analysis. Since the omitted portion of the proposed course runs through areas of important and potentially sensitive botanical and wildlife resources, impacts on these resources would not occur. Several archaeological sites, as well as 12 to 15 miles of essentially roadless terrain, would also be avoided.

Impacts on the alternative section of the course (Patton's Trail and Piccadilly Lane) would be minor relative to the proposed segment (east of Cadiz Dry Lake), as these are established routes. Noise and dust would still be generated and soils disturbed but not to the extent as on the proposed segment due to its greater length and higher percentage of roadless terrain. Vegetation and wildlife habitat would still receive some impact along the Patton's Trail alternative, but again, not to the same extent as along the proposed segment. The overall "savings" in terms of environmental consequences is considered significant.

Under this alternative, there would still be unavoidable adverse environmental consequences,but to a somewhat lesser degree than as described under the proposed action. A relatively sensitive (proposed) segment of the course would be omitted in favor of an environmentally less sensitive (alternate) course segment.

Public Comment Alternative

Unavoidable adverse impacts described for the proposed action also apply to this alternative; however, the portions of the proposed course committed under this alternative would be excluded from that analysis. In total length, this alternative is shorter compared to the proposed action, yet greater surface disturbance would be realized due to the higher percentage of roadless terrain crossed along the southern edge of Bristol Dry Lake and through the Kilbeck Hills. These two areas would receive unavoidable damage or destruction to vegetation and wildlife habitat and disturbance to soils.

The Cadiz Dunes (sensitive wildlife habitat) and the west side of the Iron Mountains (potentially a high impact area for botanical resources) would be avoided under this alternative. Two areas of botanical concern (east of WSA 207 and near Sheephole Pass) would also be avoided. The length of trails used along the borders of WSA 305 is significantly reduced and WSAs 207 and 304 would be avoided entirely. A series of water bars along Amboy Road would not be damaged. Compared to the proposed action, the "savings" in terms of unavoidable adverse impacts would be significant.

No Race Alternative (No Action)

Impacts identified for various environmental resources as a result of the proposed (or alternative) action would not occur under this alternative. Existing impacts and actions responsible for modifications of the areas in question would continue to occur.

There would be no unavoidable adverse environmental impacts to the subject areas under the no-race alternative other than those which are already occurring under existing land-use actions. This alternative would preclude generation of 5000+ visitor use days of organized recreation. The recreational activities of some of the participants would be displaced to other areas and would be likely to occur under much less organized conditions, resulting in potentially significant environmental damage.

RELATIONSHIP BETWEEN SHORT-TERM USES OF THE ENVIRONMENT AND THE MAINTENANCE OF LONG-TERM PRODUCTIVITY

Although the proposed action would only last one day, the resulting environmental consequences could extend over a long-term period, particularly if the event were held annually. Reduction in productivity would occur through loss of and disturbance of soils and destruction of vegetation. This, in turn, would constitute degradation and/or loss of wildlife habitat. With the alteration of habitat, changes in species abundance and composition of both plants and animals may be anticipated. When species diversity and biomass diminish, biotic communities would be simplified and stability reduced. Some reduction in long-term productivity would be an ultimate consequence.

Impacts resulting from the first running of a race would be much greater than impacts generated from subsequent events since the greatest amount of resource damage would be incurred during the first race. This would be particularly true in areas where definable routes of travel are lacking. As a result of continued use, productivity would further decline and recovery time would lengthen.

The proposed race and its attendant actions would produce only momentary intrusions of noise, fumes and dust which would cause short-term degradation of scenic/visual resources. A more long-term degradation would result from modification of surface and vegetation features such as creation of roads, trails, and denuded areas. It should be noted that this would pertain only to start/finish and pit areas (which are already impacted) and portions of the proposed course lacking in well-defined routes of travel. Nevertheless, some roads and trails would be created and some areas further denuded.

The long-term productivity of the environment must be considered against the benefits of short-term and long-term social gains. The short-term gains, if the event were permitted, would be the recreation offered to over 2,000 racers, pit crews and family members and the economic benefits to local communities. The availability and use of a new long distance race course would reduce to some extent pressures on other courses or areas used competitively. This could be a long-term gain if the race were to become an annual event. Approval of this action would also provide some incentive for riders to participate in organized, mitigated events instead of racing or playing on their own, where the potential exists for significantly greater environmental impact. Such participation could also encourage more environmentally sound racing practices.

The potential long-term consequences would be a loss or deterioration of some natural, cultural and aesthetic values and resources which would otherwise be passed on to future generations.

Under the Patton's Trail and Public Comment alternatives, environmental consequences identified in this section under the proposed action would not occur on the proposed course segment along the east side of Cadiz Dry Lake.

The relationship between short-term uses of the environment and main-maintenance of long-term productivity would not change from existing situations if the race were not held.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

If the proposed action were permitted for one year only, the commitment of resources would be largely temporary. Time would exist for most resources to recover and thus they would not be irreversibly committed. Some soils would be lost, some plants and animals killed or severely injured and possibly some cultural resources destroyed. The use of BLM personnel and local law enforcement agency manpower represents a short-term irretrievable use of government gunds. Fuel used by the racers, crews and family members would not be available for alternative uses and would thus be irretrievably committed.

If the race were permitted on an annual basis, effected resources would be committed on a more long-term basis. The greatest commitment would occur during the first few years (during which the majority of impacts would occur); thereafter, effected resources would be committed at a reduced rate. Permanent losses of soils from wind and water erosion would occur. Climax plant communitities would be adversely affected and resident wildlife populations would suffer declines in numbers and diversity. Many years and even decades would be reuired for such communities to re-establish. Because most desert communities require such long periods for recovery, they are not renewable in the short term and would thus be "irretrievably" committed, at least for the foreseeable future.

It should be noted that, in most instances, the impacted components of soil, vegetation, and wildlife habitat and populations could be restored to natural or near st natural conditions. Full restoration, however, would depend upon cessation of any disturbing activities and would likely require many years in a desert environment. Continued use, even only once a year, would not permit complete restoration and these resources would be irretrievably committed.for the life of the event. Indirectly, the event could be expected to create access and attract at least a few people to areas where cultural resources are located, increasing the probability of additional losses.

The Patton's Trail alternative avoids most of the sensitive areas along the proposed course located in the Cadiz Dunes. Therefore, the long-term commitment of vegetative and wildlife resources of this sensitive area would be eliminated and somewhat reduced overall. If the race were to be permitted on an annual basis, the irretrievable loss of resources would be less than for the proposed course, but not significantly so. Otherwise, the substance of the analysis addressed under the proposed action applies to this alternative.

The public comment alternative, since it is 40 miles shorter, would commit fewer resources for the duration of the event than would the proposed course. By avoiding several areas on the proposed course having sensitive resources, and substituting course segments with less sensitivity, the amount of resources irretrievably committed to this action would be reduced. Otherwise, the substance of the analysis addressed under the proposed action applies to this alternative.

Under the no race alternative, there would be irreversible or irretrievable commitment of resources other than those committed under existing land use actions.

CHAPTER V

PUBLIC COMMENTS AND REVIEW

REVIEW AND COMMENTS OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Comments on the draft EIS were requested from the following agencies, organizations, and interest groups.

FEDERAL AGENCIES

Department of Health, Education and Welfare
Department of Transportation

Department of Interior

- Bureau of Indian Affairs
- U.S. Fish & Wildlife Service
- Heritage Conservation and Recreation Service
- National Resources Library
- National Park Service
- Joshua Tree National Monument

Federal Highway Administration
Advisory Council on Historic Preservation
Environmental Protection Agency

Department of Agriculture

- Soil Conservation Service

Department of Commerce
California Desert Conservation Area Advisory Committee

U.S. Marine Corps, Twentynine Palms Marine Corps Base

STATE AND LOCAL AGENCIES

California State Clearinghouse
California Department of Fish and Game
University of California, Riverside
San Bernardino County, Environmental Improvement Agency, Planning Department
Native American Heritage Commission

STATE AND LOCAL AGENCIES (cont.)

State Historic Preservation Officer
Parker, Arizona, City Council
Colorado River Indian Tribal Council
Chemehuevi Tribal Council
Manuel Band of Mission Indians
Morongo Indian Reservation Tribal Council
Metropolitan Water District
California Highway Patrol

PRIVATE ORGANIZATIONS

Atchison, Topeka, & Santa Fe Railway Company
Public Lands Institute
Committee for Green Foothills

Sierra Club

- San Gorgonio Chapter
- Legal Defense Fund, Inc.

California Native Plant Society
Parker, Arizona, Chamber of Commerce
Natural Resources Defense Council
California Off-Road-Vehicle Association
American Motorcycle Association
Checkers Club, District 37, AMA
Southern Pacific Land Company
Continental Telephone Company
Southern California Edison
National Lead
Lavic Stone Corporation
National Chloride
Lee Chemical
Delta Chemical
Cycle News
Automobile Club of Southern California
The Wilderness Society
Buena Vista Audubon Society
Desert Tortoise Council

WRITTEN COMMENTS ON THE JOHNSON VALLEY TO PARKER DRAFT EIS

Letter
No.

1. Motorcycle Industry Council, Inc. (Mark W. Anderson)
2. Sierra Club: Southern CA Regional Conservation Committee (Jim Dodson)
3. Norman & Shirley Holste
4. AT & SF (D.G. McInnes)
5. SCE (D.L. Mules)
6. Earl Benham
7. Sierra Club: San Gorgonio Chapter (Ike Eastvold) (Prepared Statement at Public Meeting)
8. San Bernardino Valley Audubon Society (Eugene Cardiff & Lawrence LaPre)
9. U.S. Dept. of Transportation, Federal Highway Administration, Region nine (Neil Dillabough)
10. U.S. Environmental Protection Agency, Region IX (Sheila Prindiville)
11. The Desert Tortoise Council (David Stevens)
12. Defenders of Wildlife
13. Sierra Club Legal Defense Fund
14. Heritage Conservation and Recreation Survey (Pacific Southwest Region)
15. American Motorcyclist Association
16. California Off Road Vehicle Association
17. U.S. Geological Survey
18. The Wilderness Society
19. The Metropolitan Water District of Southern California

MIC
MOTORCYCLE INDUSTRY COUNCIL, INC.

Administrative Office

BLM/Cima
Resource Area
RECEIVED
AUG [illegible] 1980

August 13, 1980

1 Mr. Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
P.O. Box 305, Front Street
Needles, California 92363

Dear Mr. Crowe:

I recently received a copy of the Draft Environmental Impact Statement for the Johnson Valley to Parker Motorcycle Race, dated August 1980. In response to the Draft, I am submitting some brief comments.

The Motorcycle Industry Council is a national non-profit trade association representing manufacturers of motorcycles and motorcycle parts and accessories, and members of allied trades. The MIC represents over 140 member companies, and we would like to voice our support of point-to-point motorcycle races such as the Johnson Valley to Parker event.

Racing events such as this one, when conducted under pre-set, controlled guidelines, with a specific route, are very positive things to all of those involved. The desert environment is protected to a great degree in that most of the course can be routed over previously used roads and ways (being careful to ensure safety to the riders on graded roads). The event will only be a once a year occurence, and the sponsoring club will undoubtedly be very willing to comply with all of the stipulations and requirements designated in the EIS to insure that the event be held annually.

The sport of motorcycle racing in the desert attracts a great number of people to the area and greatly stimulates the economy of nearby communities. This event may have up to 800 participants and at least that many more spectators and "pit crew" members. This could be a significant impact on the local business establishments.

4100 Birch St. Suite 101 • Newport Beach, Calif. 92660 • (714) 752-7833 • Telex 67-8302

The number of racing events has steadily declined in recent years due to the difficulty in obtaining new courses to conduct races on. The participation of motorcyclists has consequently dropped also. The motorcycle industry would support the establishment of new point-to-point races such as the Johnson Valley to Parker event to bolster new confidence in motorcyclists that there are indeed new courses to race, even if only once a year. An event such as this one could easily become an annual outing for hundreds of families and groups interested in participating.

Once again, the MIC supports the concept of annual point-to-point races and we are grateful for this opportunity to comment.

Sincerely yours,

Mark W. Anderson
Recreation Planner

MWA/te

BLM/Cima
Resource Area
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AUG

SIERRA CLUB
Southern California Regional Conservation Committee

43730 Higbee
Lancaster CA 93534

11 August 1980

Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
P.O. Box 305, Front Street
Needles CA 92363

Dear Dick:

As promised, here are some suggestions for alternative route modifications and other mitigation measures based on our observations from the field trip.

2-1 I believe we made quite clear our concern over the use of the southern portion of Cadiz Valley for this event. Both the sand dune habitat and enriched desert scrub that the course uses in this area are high in wildlife and vegetation resources, have no consistently identifiable routes of travel, and would be essentially off-road sections of the race. Use of the Patton's Trail alternative reduces the amount of impact that would result, but does not solve the problem. We suggest that a route alignment developed through the negotiation process last year be considered as an alternative. At the north end of the Calumet Mountains, the route would go east as at present, would turn southeast a couple of miles before reaching the county road, and then parallel the road. After passing north end of the Kilbeck Hills, it would continue to parallel the road, reaching the west end of Danby Dry Lake, and pass around its south side to join the currently proposed route at the north end of the Iron Mountains. We are not proposing any specific alignment, but are fairly certain that there is enough tracking in the area that a route with at least as good a validity as the current proposal for Cadiz can be found.

2-2 Our second area of concern is the route through WSA 304A (Amboy Crater). You have stated that no reasonable alternative was found to passing through the area, but your position would be much stronger if you had presented the best such alternative in the EIS and discussed why it would not work. If this passage is to occur, mitigation measures will be needed to prevent degradation of the WSA for future wilderness designation. The northern portion should be kept as close as possible to the highway, especially before entering the lava flow. The route should avoid the six sections proposed for a National Natural Landmark. The extra flagging called for in the EIS should be used. We would also recommend a no passing zone in the northwest portion.

2-3 Our third area of concern is in the area east of Ragtown. We visited this area on the field trip last year, and found the wash to have high resource values. Both live tortoises and extensive burrowing were present, as well as a great deal of other wildlife. The desert pavement section that the route would cross to rejoin the gas line road shows no signs of previous use (as recognized by the EIS). Extra flagging is called for on only a portion of this segment; but even if imposed on all of it, we question the enforceability in view of the braided nature of the wash and the openness of the desert pavement. When these objections were raised last year, the race organizers agreed to abandon this area and move their start. We again recommend that it be deleted, and that the race be routed along the gas line road instead.

2-4 A final area of specific concern is the start within Johnson Valley with regard to possible damage to creosote rings. Extreme care should be taken to prevent any damage to these clonal groups, as they are proposed for an ACEC. The EIS should be more specific as to their location in relationship to the start, and their potential for damage from racers or race related uses such as camping or pre-race recreation.

2-5 As I mentioned, we would appreciate two sets of numbers. You should have some statistics about race starts in Johnson Valley (how many annually and what sizes - largest, smallest, and average). A 400 bike unit is rather large, and we may wish to propose some change here in our final comments. Also, can the race organizers make some estimate as to the expected number of competitors likely still to be running at each of the pit areas? This would assist our evaluation of likely impacts in the latter stages of the race.

These comments are preliminary, in that they only propose some site specific concerns we developed from the field examination and are intended to help you in any further consideration you give to alternatives. We will advise you if any additional such items are brought to our attention, and will submit a full set of comments later in the public comment phase.

Respectfully yours,

JIM DODSON
Chair, Desert Committee

Cy to: Hillier
Ruch

RESPONSE:

2-1 See course description of the Public Comment alternative, sections 6 and 7 (page II-24).

2-2 See pages II-25, II-26 (#5), IV-26.

2-3 We considered the suggested route change, but for reasons of safety did not include it in the Public Comment alternative. Too many consecutive miles of high-speed, straight race course can be dangerous for the participants. Although Desert Tortoises occur here, their density was not high enough to give this area special consideration. No other outstanding resource values were located along this segment.

2-4 See page II-10. The creosote rings are far from the Anderson Dry Lake start area.

2-5 See pages II-11, III-46.

BLM/Cima
Resource Area
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AUG 20 1980

Yucca Valley, Calif.
August 18, 1980

BLM Area Manager
P.O. Box 305
Needles, Calif. 92363

Dear Sir

We are writing to you to give you our comments on you proposed motorcycle race from Johnson Valley to Vidal Junction.

Your proposal for an 800 motorbyke cross country run in unfavorable to us. Listed below are the reasons we wish to protest your race.

1st - 800 motorcyclists at one time - the noise polution would be deafening. (We own 4 wheelers, but we have to have mufflers on them and we have to buy license plates at an ungodly price to be legal and we don't drive them as fast as we can and irritate people.)

3-1 2nd - You have not considered the polutition of trash they will throw along the way.

3-2 3rd - How about bathroom facilities?

4th - Its bad enough to have dozens and dozens of motor bikes going by our place on weekends when we own private property in the Johnson Valley - Landers area. We thought that Soggy Dry Lake was where they were to ride, not all over private lands and over our unmaintained roads making them rough from all their dirt spins, etc.

3-3 5th - What you don't realize is motorcyclists do not stay on established roads. They cut here and cut there until you have trails all over the place.

3-4 6th - Why is it everytime there is a motorcycle event it has to be a race? Why can't they go to a race track to have their race?

7th - Why don't you have your motorcycle race from Pasadena to Laguna? Then see how the city people like it. Why do you come out to where you think No One lives?

WE WANT YOU TO DENY THIS EVENT.

Sincerely,
[illegible] B. Holste
Shirley M. Holste
P.O. Box 304
Yucca Valley Calif. 92284

RESPONSE:

3-1 Trash will not be a problem except at the start/finish and pit areas. One of the measures required of AMA is to remove all debris within 10 days of the race. (page II-12).

3-2 Sanitary facilities are required by AMA rules and BLM permit regulations (page II-13).

3-3 This is a controlled race course, not a designated zone for vehicle "play". Any participants who stray beyond the bounds of the course will be disqualified.

3-4 There are several kinds of motorcycle events, not all of which are races. Many events are held at race tracks.

The Atchison, Topeka and Santa Fe Railway Company

A Santa Fe Industries Company

1170 West Third Street
San Bernardino, Calif. 92410

August 20, 1980
File: T-44081-19

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Resource Area
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AUG 21 [illegible]

4 Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
P. O. Box 305, Front Street
Needles, California 92363

Dear Mr. Crowe:

Please refer to proposed Johnson Valley to Parker Motorcycle Race scheduled for October or November 1980.

This is to advise that we do not wish to consider using any of our rights of way or bridge structures in connection with the above race. Also, we do not wish to consider your crossing over or under any of our trackage on any private crossing of our right of way. All crossings of our trackage will have to be confined to the existing public road crossings in the area. Prior to setting up of your course, please contact this office to confirm private or public status of any crossings you propose to utilize.

Yours truly,

D G McInnes

D. G. McInnes
Superintendent

cc: Mr. Gerald Hillier, Riverside District Manager
United States Department of the Interior
Bureau Of Land Management
Riverside District Office
1695 Spruce Street
Riverside, California 92507

Mr. H. D. Fish - Los Angeles (BH-70437-6)

Southern California Edison Company

P.O. BOX 410
100 LONG BEACH BLVD.
LONG BEACH, CALIFORNIA 90801

C. J. LOWERISON, JR.
MANAGER
OF
RIGHT OF WAY AND LAND

BLM/Cima
Resource Area
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AUG 28 1980

Mr. Dick Crowe
Area Manager
Cimi Resource Area Office
Bureau of Land Management
P. O. Box 305, Front Street
Needles, CA 92363

August 27, 1980

Dear Mr. Crowe:

Subject: Draft Environmental Impact Statement
Johnson Valley to Parker Motocycle Race

The Southern California Edison Company has reviewed the subject environmental statement and it has been determined that this race could have an adverse affect on our transmission facilities in the area.

5-1 Motorcycles would cause erosion to our patrol roads in addition to creating contamination to our insulators due to heavy dust conditions created during the race.

5-2 Should it be determined that a Special Use Permit will be issued for this event, the Edison Company would appreciate at least six weeks notice in order that we may review the course and possible affects upon our rights of way.

If you have any questions, please call me at (213)435-1121, extension 348.

Very truly yours,

D. L. Myles

D. L. MYLES
Right of Way and
Land Department

RESPONSE:

5-1 See mitigation measure 6 on page II-26. Periodic maintenance should alleviate any potential problems to insulators from dust raised by a permitted event.

5-2 In preparation of the issuance of a Special Recreation Use Permit, the AMA sponsor has been notified that SCE wishes 6 weeks notification instead of the stipulated 4 weeks.

11007 Santa Paula,
Lamont, Calif. - 93241,
8-27-80.

BLM/Cima
Resource Area
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SEP 2 1980

6

Bureau of Land Management,
Needles, Calif.

Dear Manager,

Motorcycle races should not be permitted in San Bernardino County within the California Desert Conservation Area.

I have read several news item that told about the ill effects of motorcycle races. I have never read one that told about the benefits of such races to the landscape, and the plants and animals that inhabited it.

Sincerely,
Earl Benham

SIERRA CLUB
SAN GORGONIO CHAPTER
Serving Riverside & San Bernardino Counties
P. O. Box 1023
Riverside, California 92502
Founded 1892

Mojave Group
Tahquitz Group
Serrano Group

REPLY TO:
IKE C. EASTVOLD
541 PROSPECT STREET
HIGHGROVE, CALIFORNIA 92507

BLM/Cima
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SEP 4 1980

September 7, 1980

Dick Crowe, Area Manager
BLM Cima Resource Area Office
P.O. Box 305, Front Street
Needles, CA 92363

re: Statement of the Sierra Club given at the 9/7/80 EIS public hearing: JV/Parker MC race.

Dear Mr. Crowe:

The Sierra Club appreciates the opportunity to appear before you this evening, and offer comments on the proposed Johnson Valley to Parker motorcycle race. We have participated in your August 9th overflight of the proposed course, and submitted our suggestions for alternative route modifications per your request (cf. Sierra Club Desert Committee letter of August 11, 1980). Our comments this evening will be supplemented by additional resource-specific comments. Also, the Sierra Club Legal Defense Fund, SCRCC Desert Committee, ORV Task Force, and other entities of the Club may wish to submit written comments before September 14th.

When this Checkers Motorcycle Club race was proposed last fall from Ludlow to Parker, we participated in several weeks' worth of mediated sessions, field and aerial inspections of the course, and issue-identification sessions. A compromise course route was agreed upon preliminarily by all parties, but finally rejected by the motorcyclists for reasons of race appeal and safety.

We were therefore surprised when we received this year's draft EIS, and found that not only the compromise alternative route of last year was not mentioned, but no alternative was proposed which would have met the environmental concerns so laboriously identified during last year's round of sessions. Our input and extensive public comment identified these concerns last year. Ignoring them this year is a great waste of everyone's time and effort. Furthermore, since you have not proposed a range of environmentally-acceptable alternatives, you have unnecessarily put motorcyclists and environmentalists on a head-on collision course. This was the very situation we sought to avoid by agreeing to invest large amounts of our time and energy in your mediated sessions, field inspections, etc.

LACK OF A RANGE OF REASONABLE ALTERNATIVES

7-1 The conspicuous lack of a reasonable range of alternatives in your draft EIS, therefore, was the first and most conspicuous deficiency which struck our reviewers. As you know, such a reasonable range of alternatives is required under the CEQ NEPA guidelines. The compromise alternative identified during the Ludlow to Parker negotiations last year should, at the least, have been included for public comment. It is very likely that the safety-related concerns of the motorcyclists could have been mitigated far more easily than the environmental problems of your current proposal.

7-1 The only alternative your draft EIS offers to the proposed action is your Patton's Trail alternative. By your own admission, "this alternative is identical to the proposed action save a minor change in course alignment (II-15)." This "minor change" can hardly be said to constitute a real alternative to the proposed course, and a comparative tabulation of the impacts of the two alternatives in your Table 2.3 underscores their essential similarity. These two action alternatives, in addition to the required No Action alternative, comprise the three alternatives you offer the public. Clearly, they do not constitute a reasonable range of real alternatives, and your draft EIS must be judged to be inadequate under the CEQ NEPA guidelines.

Indirectly, passages in your draft EIS admit that there are other alternatives which, although viable, were not considered. In your discussion of impairment of wilderness values from the proposed event, you state that "if impacts (to WSAs)... exceed expectations, future events would be...rerouted around these areas, and these areas (WSAs) rehabilitated until their wilderness status is decided by Congress. (IV-24)" This statement is made despite another statement that the "course runs through WSA 304A for 13½ miles because any alternative route would be considered less safe (II-10)." The two statements appear mutually exclusive, but the former statement at the least is an admission that there are alternative courses routes which would avoid the Wilderness Study Areas. Why were not these alternatives, along with others which would have addressed the more serious environmental concerns, considered in your EIS? The proposed action, with some fine-tuning, is a dream-come-true for the motorcyclists. When different parties come together to try to work for a viable compromise, each party comes with certain demands. When these parties leave the bargaining table, they all leave some of their demands on the table, if they have negotiated an agreeable solution. Your proposed action, and Patton's track alternative, would leave practically all the the public interest demands on the table, and practically none of the motorcyclists' demands.

PRE-JUDGING THE DESERT PLAN

7-2 Since the Proposed Plan for the CDCA would be released September 30, 1980, for a final 30-day period of public comment, this Johnson Valley to Parker race would actually be run during the comment period, if the date of October 25th were adhered to. The timing here is particularly bad since, as you state in the EIS, "this race this fall....(may possibly) become an annual event (II-1)," that is, it may become a built in part of the

Desert Plan without the reviewing public ever hearing about it in your draft Proposed Plan. If you had shown this course alignment in the Proposed Plan, and let the public comment on its appropriateness within the context of the full desert-wide Planning process, then the public's right to comment would at least have been protected. But handling things in this piece-meal fashion is like local government doing spot-zoning for favored developers before an area has an overall General Plan. In both cases, the overall, larger Planning Process is pre-judged, since the final plan must, by necessity, accomodate whatever uses are zoned or permitted before the larger view is taken.

7-2 Some very crucial Desert Plan decisions stand to be pre-judged by this race event. First, the public will be presented with your draft Plan September 30th, and find a number of highly-controversial changes from last February's document. One of the more controversial changes in the Multiple Use Class Guidelines will be the allowance in Class Limited (L) of competitive events, and the allowance of pit, start, finish, and spectator areas in Class Moderate (M). Racing across Class L, once touted by the Bureau as an "alternative to wilderness", would be allowed on what are termed "approved routes of travel" in the draft Proposed Plan. Since your EIS says, "The Proposed Action will be fully consistent with the Proposed Plan for the CDCA," and "is consistent with both the MUC guidelines in the Plan and the eventual designation of specific competitive event corridors (1-7)," does this mean that the cross-country portions of the race, where they traverse proposed Class L lands, are on "approved routes of travel?" The JV to Parker is, if consistent with your Proposed Desert Plan, defining "approved routes of travel" to include cross-country racing. The public will probably find this contrary to the basically protective goals of Class L, and should have an opportunity to comment before the issue is committed.

Secondly, the boundaries of the Cadiz Dunes closed area will probably be decided by this race route, just as the Turtle Mtn and Whipple Mtns WSA boundaries were drawn to follow, in most cases, the Parker 400 route. Also prejudiced will be the boundaries of the Johnson Valley creosote ring ACEC, and the Amboy Crater ACEC. The Amoby Crater proposed National Natural Landmark boundaries may also be prejudiced. These boundary decisions should be made within the context of the desert-wide planning process, and not pre-judged by this proposed event. Similarly, the Multiple Use Class Guidelines are too important to be prejudiced by this event. BLM may have its mind made up on what the Desert Plan will and will not be, but the public clearly doesn't.

IMPAIRMENT OF WILDERNESS STUDY AREAS

7-3 Not only doesn't the public have its mind made up on the Desert Plan, but Congress hasn't had an opportunity to act on BLM's wilderness suitability and non-suitability recommendations. Supposedly, your Interim Management Policy and Guidelines for Lands Under Wilderness Review (12/12/79),

would preserve the wilderness quality of identified WSAs until Congress can act. Your draft EIS asserts that running this event through WSA 304A and 305 would be in accord with your IMP, and wilderness quality would not suffer enough to constrain Congress' ability to designate the areas as wilderness. Your assertions are made despite the fact that the event would traverse both WSAs on alignments involving significant sections of trackless or cross-country travel. The IMP states that this cross-country use of WSAs for competitive events would "rarely" be allowed; but where allowed, rehabilitation would be necessary to restore the area to its original wilderness quality. Even if racers could be confined to a 15' wide track across the 13½ miles of WSA 304A, a 15-foot swath of road that long would
7-3 constitute a significant scar along the north and east sides of the WSA. If such a scar had existed during the wilderness inventory, it would have become the boundary of the WSA, as was the case with the Parker 400 course. We believe that, not only cannot such a scar be successfully rehabilitated for obvious reasons in arid lands, but that its creation would constrain Congress, if a decision was made to declare Amboy Crater a wilderness area, to draw the boundaries somewhere inside the scar.

As we pointed out above, your own EIS speaks of alternatives to running the course through WSAs, yet those alternatives were not explored. We feel the course should be kept away from the Amoby Crater WSA and the Cadiz Valley WSA altogether, and other alternatives considered instead. The precedent set by running a race like this through two WSAs when other alternatives, by your own admission, are available, is intolerable, and an affront to the public's clear desire for desert protection.

Others here tonight will speak to additional environmental concerns regarding rare plant species and the oldest living things in the world, the creosote rings in Johnson Valley and the Cadiz Valley which would be impacted by this event. These and other site-specific concerns will be the subject of additional comments we shall make on site-specific matters before the comment deadline on September 14th.

Because of the fundamental problems we have tonight outlined with this proposed event, and the additional site-specific problems we will later outline, the only viable alternative presented in your EIS is the No Action alternative. We will continue to work with the BLM and responsible motorcycle and ORV groups to try and find an environmentally-acceptable middle ground in these serious controversies. Unfortunately, the current proposal in your EIS offers no such middle-ground, and so it must be rejected.

Sincerely yours,

Ike Eastvold
Conservation Chairperson

RESPONSE:

7-1 See pages II-23 and II-25. The Patton's Trail alternative, although a "minor change in course alignment," was identified as creating significantly less impact to the sensitive Cadiz Dunes area than the proposed course would.

7-2 See page II-28.

7-3 See pages IV-26 and IV-27. The wilderness definition of a road does not include those routes created solely by having had vehicles driven over them. The proposed course was never routed through WSA 305; it passes through roadless area 305, whose eastern half used by the course was judged not to meet the criteria for wilderness.

SAN BERNARDINO VALLEY AUDUBON SOCIETY
2024 Orange Tree Lane
Redlands, California 92373

BLM/Cima
Resource Area
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SEP 8 1980

September 4, 1980

Mr. Dick Crowe
BLM--Cima Resource Area
P. O. Box 305, Front Street
Needles, California 92363

Dear Mr. Crowe:

The San Bernardino Valley Audubon Society appreciates the opportunity to comment on the draft Environmental Impact Statement for the Johnson Valley to Parker Motorcycle Race. Our Board of Directors has discussed this proposal and the alternatives. Although we prefer the No Race Alternative, if the event must take place, we would tentatively support the Patton's Trail Alternative with certain modifications. The Proposed Action is unacceptable in our view because of excessive damage to desert plants, wildlife, and wilderness.

The EIS is deficient in its analysis of the race impact within the
8-1 Johnson Valley Open Area. The course should be carefully routed at the
beginning and not left to sponsor option. Upper Johnson Valley, Fry
Valley, and the surrounding hillsides are prime locations for the formation
of ancient clonal desert plants. Circular clonal rings of Creosotebush and
Mojave Yucca exist in these areas. Their development and longevity have
been extensively studied by Dr. Frank Vasek of the University of California
8-2 at Riverside, and the results have been published by the California Native
Plant Society. The Desert Plan recognizes these regions of ancient clones
as unique plant assemblages, and protective management as an Area of
Critical Environmental Concern is proposed. The Johnson Valley to Parker
event clearly conflicts with other BLM plans for the botanical resources
in this area. A mass start of 400 motorcycles in two waves virtually
ensures destruction of many ancient Creosotebush clones in Upper Johnson
Valley. We, therefore, request re-routing of the race in this area so
that full protection is afforded to the ancient clonal rings.

The EIS identifies substantive impacts to animals in the sand dune areas of Cadiz Valley. The Mojave Fringe-toed Lizard would be adversely affected, as would the Andrews Scarab Beetle, an endemic to the Cadiz dunes. Disturbance to this sensitive and unique wildlife habitat is predicted to be too great, in our view, to be acceptable. In contrast to the Proposed Action, the Patton's Trail Alternative would avoid adverse impacts to sand dune wildlife.

Impacts to species inhabiting desert washes, particularly birds,
are also quite severe. We suggest re-routing the racecourse to avoid
8-3 the major washes, especially in the Parker 400 leg of the proposed course.
Passing should be prohibited in desert washes to minimize disturbance.

8-4 We do not believe that the routing of the proposed race through the Wilderness Study Areas can satisfy wilderness non-impairment criteria. Certainly 800 racing motorcycles will leave a significant scar on the landscape for years to come. WSA's 304A and 305 are likely to suffer significant damage from this event. Considering the possibility that this course will be used for future competitive vehicle events, we believe that the proposed action is contrary to guidelines for management of WSA's.

8-5 Three rare and endangered plant species were identified as occurring along the racecourse. One, the Alverson's Foxtail Cactus, is listed as very rare and endangered by the California Native Plant Society and is recognized on the Smithsonian Threatened list. No mitigation is proposed to protect these rare plants. Pholisma and Cyanchum plants may also suffer damage. We request specific measures to preserve these rare plants in their native habitat, such as altering the course where they occur or erection of protective barriers.

8-6 The race will directly impact habitat and perhaps individuals of the Desert Tortoise in the Vidal Valley. We would like to see mitigation measures established before October 25 that will replace lost habitat for the Desert Tortoise.

We hope that you will carefully review our comments in regard to this event. Establishment of a permanent racecourse in the desert has significant environmental and social consequences. Careful planning could avoid the most damaging impacts. We are willing to aid in the planning process to mitigate adverse impacts to native plants and animals. You may contact us at the above address or by phone (Cardiff 714/792-1334, LaPre 714/787-3789) for further discussion of concerns to our membership about this competitive event.

Sincerely,

Eugene Cardiff
President

Lawrence F. LaPre'
Chair, Conservation Committee

LFL/ebe

cc: Jim Ruch, BLM State Director
Deborah Reames, Sierra Club Legal Defense Fund

RESPONSE

8-1 See page II-10.

8-2 The cresote rings are avoided by the proposed course in Johnson Valley. Others in Cadiz Valley will be protected by mitigation (see page II-26).

8-3 The Parker 400 segment of our proposed course has been used for 10 events; portions are also used for mining access. Since most of these washes are crossed, and not followed, by the Parker 400 road, any rerouting in this area would have caused more impacts than on the proposed course.

8-4 See pages IV-24 to IV-27.

8-5 On one area of occurrence, the Alverson's Foxtail Cactus has been protected by a cairn/wall facing the course using hand-carried boulders. The other location will be protected in a similar manner. The Pholisma and Canchum specimens are protected by terrain (they are on a rise above a wash used for the course) and will require no mitigation.

8-6 The course in Vidal Valley follows the Parker 400 road. Any new impacts to Desert Tortoise habitat will be insignificant since the motorcycles will be restricted to the road. In all likelihood, considering the time of year, most individuals would not be out on the surface. Disturbance to burros will be unlikely because the racers will be restricted to the road surface (we expect 100% compliance here).

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
Two Embarcadero Center, Suite 530
San Francisco, ~~California~~ 94111

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA

September 4, 1980

BLM/Cima
Resource Area
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SEP [illegible] 1980

IN REPLY REFER TO
HED-09

Mr. Dick Crowe
Cima Resource Area Manager
Bureau of Land Management
P.O. Box 305, Front Street
Needles, California 92363

Dear Mr. Crowe:

We have reviewed the Draft Environmental Impact Statement for the proposed Johnson Valley to Parker Motorcycle Race, San Bernardino County, California, and provide the following comments.

1. The Draft EIS states on page IV -2 that dust generated by an ORV race
will reduce visibility and may result in a safety hazard. The EIS
states further that the dust plume could spread five miles downwind
and last for two days. There are several highways in the area ---
Interstate 40, U. S. 95, State Route 62, and numerous local roads ---
9-1 that might be affected. The EIS needs to address the magnitude of this
dust problem and describe the mitigating measures that will be taken
to reduce this safety hazard. Will motorist visibility be reduced to
10 yards? 100 yards? 1000 yards? Are highway accident rates expected
to increase? Will posted speed limits be reduced or highways temporarily
closed because of the dust clouds? Will signs be placed along affected
roadways warning motorists of dust clouds?

2. Page II -11 states that roads will be crossed five times. These roads
need to be identified. The EIS should also provide the ADT (average
daily traffic) of each road, the approximate time delay to the highway
9-2 traveler as the race participants cross the roadway, and a brief
description of the traffic control system that will be used to insure
the safety of the race participants and the highway traveler.

We appreciate this opportunity to review the subject Draft EIS and would like to receive two copies of the Final Statement when it becomes available.

Sincerely yours,

Neil Dillabough, Director
Office of Environment and Design

RESPONSE

9-1 See page IV 2.

9-2 The race route would cross US 95 and as many as three small secondary roads. No delay would result to highway travelers as the racers would give them right-of-way, and a flagman will be present at each the crossing to signal to riders as they approach the crossing (see pages II-13 and II-14).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

BLM/Cima
Resource Area
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SEP [illegible] 1980

10 SEP 1980

Project #D-BLM-K61045-CA

Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
P.O. Box 305, Front Street
Needles, CA 92363

Dear Mr. Crowe:

The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled JOHNSON VALLEY TO PARKER MOTORCYCLE RACE.

The EPA's comments on the DEIS have been classified as Category ER-2. Definitions of the categories are provided by the enclosure. The classification and the date of the EPA's comments will be published in the *Federal Register* in accordance with our responsibility to inform the public of our views on proposed Federal Actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

The EPA appreciates the opportunity to comment on this DEIS and requests three copies of the Final Environmental Impact Statement when available.

If you have any questions regarding our comments, please contact Susan Sakaki, EIS Coordinator, at (415) 556-7858.

Sincerely yours,

Clyde B. Eller, Acting
for Sheila M. Prindiville
Acting Regional Administrator

Enclosure

General Comments

1. EPA's letter of May 15, 1980 which provided comments with respect to BLM's Draft California Desert Conservation Area (CDCA) land alternatives, indicated that the alternatives in the Plan did not appear to provide sufficient protection of this fragile ecosystem. The proposed event will take place within the CDCA and it is EPA's concern that this motor cross race will further limit the alternatives which would assure protection of environmental resources.

2. 40 CFR 1502.14 of the regulations for implementing the procedural provisions of the National Environmental Policy Act requires that agencies "rigorously explore and objectively evaluate all reasonable alternatives" in a manner which serves the purpose of "sharply defining the issue providing a clear basis for choice among options by the decision makers and the public." The DEIS does not appear to provide an adequate range of alternatives to the proposed event. The FEIS should address options such as a substantially shorter race or a circular round-trip course which could serve to reduce adverse environmental impacts. **10-1**

Water Quality Comments

1. The DEIS briefly discusses the water quality impacts of the proposed action. The motor cross race will cross washes where "banks would be broken down causing potential for erosion and down-wash sedimentation (p. IV-27)." In general, the DEIS does not provide adequate information to allow for assessment of potential impacts to surface water and ground water quality. The FEIS should more adequately address water quality impacts in view of the potential for erosion, sedimentation, runoff of oil and grease to surface water bodies, and the effect of these substances on ground water resources through percolation. The FEIS should provide adequate mitigation measures for these potential impacts. **10-2**

2. On December 19, 1979 EPA approved the water quality plan developed by BLM pursuant to Section 208 of the Clean Water Act (PL 92-500). This plan for BLM lands included Best Management Practices (BMPs) for grazing and recreation. It is EPA's understanding that BMPs for mining, silviculture, roads and construction, and wildlife management were to be developed as a continuation of Section 208 Planning. Where appropriate, these BMPs should be implemented and new BMPs developed for recreational uses such as motorcycle racing. The FEIS should contain a discussion of the relationship of

Section 208 Planning to the proposed event and should incorporate any newly developed BMPs into the mitigation strategy.

3. **10-2** EPA's letter of May 15, 1980 on the CDCA DEIS expressed concern that BLM protect the precious and scarce aquifers underlying these areas which may be irretrievably lost to any beneficial uses once they are contaminated. The relationship of this proposed recreational use of BLM land within the CDCA should be delineated in the FEIS and should specifically address possible impacts to the underlying aquifers.

Air Quality Comments

1. **10-3** The DEIS indicates that the 24-hour standard for Total Suspended Particulates (TSP) would be violated (p. IV-27). The FEIS should expand on the degree of violations to be expected and include more extensive mitigation measures to alleviate dust problems.

2. **10-4** The DEIS notes that the race is not a spectator event and those spectators in attendance will be permitted only in limited areas at the start and finish points (p. II-12). However, BLM documents in the past have indicated a turnout of spectators for the Barstow race to be projected at four spectators to each participant. The FEIS should discuss mitigation measures for additional dust and emissions caused specifically by spectators, as well as the probable success of implementation of these measures.

EIS CATEGORY CODES

Environmental Impact of the Action

LO—Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER—Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU—Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1—Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2—Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3—Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

RESPONSE

10-1 See pages II-23, and II-25.

10-2 No significant impacts are predicted, therefore the discussion of surface and ground water is limited in the affected environment and environmental consequences chapters.

10-3 No additional data is available on the extent of total suspended particulates resulting from the race.

10-4 We are restricting the pits to a maximum of 4 acres, and every effort will be made to have each pit vehicle service several motorcycles. The sponsor is predicting approximately 50 vehicles at each pit. Family and friends will be restricted (as spectators) to the start and finish. We expect no problems with compliance at the pit areas.

THE DESERT TORTOISE COUNCIL

350 Golden Shore
Long Beach, CA 90802

September 9, 1980

BLM/Cima
Resource Area
RECEIVED
SEP 12 1980

Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
P. O. Box 305, Front Street
Needles, California 92363

Dear Mr. Crowe:

We have reviewed the draft Environmental Impact Report for the Johnson Valley to Parker Motorcycle Race and appreciate the opportunity to provide comments. Our primary interest is related to management of the desert tortoise. We are also however interested in and will comment on the overall environmental assessment.

The Desert Tortoise Council is a professional organization with a number of goals. The most important is the preservation and management of representative populations of the desert tortoise in the United States and Mexico. To achieve this goal, the Council provides the latest scientific information to state and federal agencies, as well as to conservation groups. One way the Council does this is by sponsoring annual symposia and publishing the proceedings. The annual symposium provides a means for all scientists, managers, and lay experts concerned with the desert tortoise to meet and present their findings and discuss management problems. Papers presented at past meetings have dealt with problems associated with habitat loss; extent of the losses; and impacts of roads and vehicles.

11-1 A serious shortcoming of this analysis is a failure to provide meaningful alternatives to the proposed action. The analysis is presented as a clear cut issue of either have a race or not have a race. The only change provided is a minor course change to use Patton's tank trail. We feel there should be a range of alternatives which would include major route changes, more and less use on existing roads, means to compare course challenge and race satisfaction with impacts and varying levels of impacts. The Council On Environmental Quality regulations for implementing the National Environmental Policy Act have specific requirements for analysis of alternatives. These regulations (40 CFR,1502.14) provide that: 1) there should be a comparative presentation of impacts of the proposal and alternatives; 2) all agencies shall rigorously explore and objectively evaluate all reasonable alternatives; and 3) devote substantial treatment to each alternative considered so that reviewers may evaluate their comparative merits.

11-2 Another concern is the use of Wilderness Study Areas. Section 603(C) of the Federal Land Policy and Management Act provides that these lands shall be managed in a manner so as not to impair the suitability of such areas for the preservation as wilderness. It is also provided that, in managing the public lands The Secretary shall take any action required to prevent unnecessary or undue degradation of the lands and their resources or to afford environmental protection. We question if this use is necessary primarily because this race is being proposed by the BLM, not by motorcycle racers, and that there are alternatives which would not use the WSA's. The analysis uses past use as a means to justify continued use (WSA 304A). Again in WSA 305, use is justified by stating that there has been past use "but all traces have been obliterated by natural processes". The tracks of previous races may have been obliterated but this ignores the previous impacts to vegetation, wildlife and soil (see your analysis, pages IV-2, IV-14, IV-16, IV-18).

We have some general concerns about some assumptions on the extent of impact areas. The first is that the pit areas will be restricted to four acres each. This seems extremely unrealistic considering that 800 motorcycles and their support vehicles will be using the area. The second is the assumption that there will be insignificant numbers of spectators. It would seem easily possible that in addition to support crews there will be several hundred to several thousand spectators. To assume that these spectators can be restricted to flagged areas at the start and finish areas seems unrealistic.

11-3 The desert tortoise (page III-21) is identified as occuring in most areas along the proposed race course, with noteworthy populations in the Vidal Valley Area. There is no discussion, however, of how the desert tortoise will be impacted. The population in Vidal Valley is part of a larger, very important, population area and is significant because it is adjacent to a high density population area. We feel that the last approximately 14 miles of race course and the finish area, have the potential to cause significant impacts to this desert tortoise population. These impacts can occur from: 1) direct killing of tortoises on the surface or in subsurface burrows; 2) crushing nests of eggs; 3) damaging habitat used for cover; 4) damaging habitat components used for forage; 5) vandalism; and 6) collectiong, particularly by spectators and support crews near the finish area. Stating in your analysis, page IV-15, that the finish area is already substantially impacted is not sufficient justification for allowing additional use. In fact when dealing with crucial habitat for the desert tortoise it would be justification for not allowing additional use. If this race is allowed we recommend that the race end before it enters the crucial desert tortoise habitat area. A less desirable alternative might be to continue the race on through the habitat to some point several miles east of the crucial habitat area. This would eliminate the effects of spectators and crews at the finish line but not the impacts along the course.

11-4 Washes are recognized in the analysis as an important wildlife habitat. However the only impacts recognized are tracks in sandy wash bottoms and disturbance. The assumption is made that the riders will avoid contact with the larger tree-like vegetation in the washes. Perhaps they will avoid the largest shrubs but much of the lower wash vegetation will be impacted. This removes cover for use during all seasons and reduces the food supply, usually the insect and arthropod populations. This would occur in at least 10 miles of washes and numerous crossings.

11-5 The proposal to monitor the impacts of this and any future races on wildlife is a good suggestion. Any anticipated results of these studies should not however reduce the utility of existing data demonstrating the impacts of vehicle use. It is unfortunate that four of the six sampling areas are no longer useful because of course changes. We do have some concerns about the adequacy of the studies to measure changes in populations. There was apparently no effort to determine actual densities of various species. Absent this information we assume the plan was to compare relative densities between treatment and control plots. Sampling bird populations between May 11 and July 5 would seem to serve little purpose since you plan to resample during the spring breeding season. Breeding bird samples should have been completed before May 11. Sampling fall and winter bird populations should be done as close as possible to the race date and probably again immediately after the race. The bird population sampling plots, 8 hectares, are much too small. Minimum size in desert habitats should be 30-40 hectares. In sampling wash habitats a variable width transect can be used but it would have to be quite long. In all cases there has to be several replications of plots in each habitat sampled. Using 50 meters as a minimum distance for the control plots is inadequate. The plot has to be far enough away to be free from any noise impact. In most cases this should be at least one mile. We feel that if a monitoring program is to be initiated there should be a very careful analysis of what information you intend to collect and measure and an equally careful design of the studies to ensure the data collected is reliable and statistically sound.

Throughout this environmental analysis there are references to

11-6 the possibility of there being additional races on this course. The impacts are presented only for this one event. We feel the analysis should state a definite proposal. Either this one race or a certain number of races annually from now on.

One final comment concerns the comments we submitted on the Parker 400 Race. We were informed by the BLM that there would be a response to our questions. As yet we have received no response.

Yours truly,

DAVID W. STEVENS,
Co-Chairman

David W. Stevens

RESPONSE:

11-1 See pages II-23, and II-25.

11-2 Wilderness suitability would not be impaired on any WSA or roadless area in accordance with "Interim Management Policy and Guidelines for Lands Under Wilderness Review," Chapter III, pages 17 and 18.

11-3 This section of the race route was determined to have insignificant impacts on tortoises based on BLM and California Fish and Game Department post-race examinations which have not documented tortoise mortality or collapsed burrows (Proposed Parker "400" Desert Race E.A. (Y-0367). Yuma District BLM.

11-4 The reduction of cover and food supply is acknowledged and was determined to be responsible for a decrease in animal populations. (pages IV-16-18).

11-5 The suggested modifications and specifications to the monitoring system are appreciated and will be considered in the design of monitoring efforts.

11-6 This EIS applies to this single event only but cumulative impacts from repetition of the event are considered and provided.

Defenders
OF WILDLIFE

To | Initial
2 SD
1 ASD
3
4
Action by 3
Surname by
Return to

September 11, 1980

James B. Ruch
California State Director
Bureau of Land Management
2800 Cottage Way
Room E-2841
Sacramento, CA 95825

Dear Jim:

Attached please find Defenders of Wildlife's formal comments on the "Draft Environmental Impact Statement: Johnson Valley to Parker Motorcycle Race."

We have sent these comments directly to you via Express Mail for two reasons. First, the Cima Resource Area office informed us of the extremely tight schedule for consideration of public comments prior to publication of the final EIS. Secondly, Defenders of Wildlife has serious problems with the DEIS and its ramifications for the ongoing CDCA planning process which we want to insure are brought to your personal attention.

For the reasons discussed in our attached comments, we urge you to adopt the "No Race Alternative." Your thorough consideration of our views will be appreciated.

Sincerely,

Ginger Merchant

Ginger Merchant
Programs Specialist

cc: Dick Crowe
Gerald Hillier

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

Defenders
OF WILDLIFE

September 11, 1980

COMMENTS OF DEFENDERS OF WILDLIFE UPON BLM'S
DRAFT ENVIRONMENTAL IMPACT STATEMENT:
JOHNSON VALLEY TO PARKER MOTORCYCLE RACE, (AUGUST, 1980).

At the outset, we wish to thank the BLM for this opportunity to comment upon the draft environmental impact statement (DEIS) upon the Johnson Valley to Parker Motorcycle Race.

Defenders of Wildlife is a non-profit, educational organization dedicated to the conservation of wildlife. Defenders is vitally interested in the management of the vast public lands of the California Desert Conservation Area (CDCA) under BLM's jurisdiction and commented extensively upon BLM's proposed plan and DEIS (February, 1980) for the CDCA. We are concerned especially that the BLM manage the CDCA to protect the fragile desert ecosystems and to serve the best interests of the American public. Further, approximately 10,000 of Defenders' more than 50,000 members are Californians and will be locally affected by BLM's management decisions for the CDCA.

Defenders of Wildlife is extremely disappointed in BLM's posture with regard to the management of off-road vehicles (ORVs) in the CDCA as evidenced by the proposed plan for the CDCA (February, 1980) and by the Johnson Valley to Parker Motorcycle Race DEIS.

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For the reasons discussed below, Defenders of Wildlife finds the Johnson Valley to Parker Motorcycle Race DEIS to be grossly inadequate. Further, as also discussed below, Defenders is opposed to either the "proposed action" (235 mile point-to-point motorcycle race through the CDCA including the Cadiz Dunes) or the "Patton Trail Alternative."

Adequacy of the DEIS

12-1 The DEIS suffers from serious deficiencies. Most obviously, the DEIS fails to present and evaluate the environmental consequences of a reasonable range of alternatives as required by Section 1502.14(a) of the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act.

Only three alternatives are considered: the proposed action, a minor modification of the proposed action (Patton Trail Alternative) and no action (no race alternative). As the DEIS states, the proposed action has the most significant (both in intensity and extent) adverse environmental impacts of the three alternatives considered. For example, the proposed action will result in unavoidable adverse impacts to previously undisturbed areas, important wildlife habitat, sensitive and significant species, and wilderness study areas (e.g. 304 A). Nevertheless, the DEIS fails entirely to consider any real alternative route to that of the proposed action. For example, there is no alternative routing which would not adversely impact previously "undisturbed areas," important wildlife habitat and species and Wilderness Study Areas (WSAs). While the Patton Trail Alternative would avoid the very significant and sensitive wildlife resources of the Cadiz Dunes, important and very productive wash habitat for wildlife, would still be extensively adversely impacted as would the WSAs and the previously "undisturbed areas" (Table 2.2).

The Proposed Action and the Patton Trail Alternative

Defenders of Wildlife is opposed to either the proposed action or the Patton Trail Alternative.

As stated above with reference to the adequacy of the DEIS, both the proposed action and the Patton Trail Alternative have significant adverse consequences for the resources of the CDCA. We find these adverse impacts as documented in the DEIS, especially those affecting wildlife, to be completely unacceptable.

Further, we find it readily apparent from the DEIS and BLM's choice of a preferred alternative that BLM placed greater priority upon meeting the wishes of the race sponsors with regard to first the "need" for such an event and second, the actual routing of the event than it has upon its obligations to protect the multiple resource values of the CDCA.

As a consequence, the proposed action and DEIS (evaluated solely on their own merits) represent an indefensible, and therefore, vulnerable concession to a highly-organized special interest group which jeopardizes the integrity of the CDCA and violates BLM's public trust responsibilities.

Beyond the serious concerns raised above, Defenders is opposed to the proposed action, Patton Trail Alternative, or any ORV point-to-point race through the CDCA this fall because these actions would prejudice final decisions concerning the CDCA management plan now in progress.

The final proposed management plan and FEIS for the CDCA are to be released October 1, 1980 and subject to a 30-day public review period prior to final agency decisions.

The draft proposed plan and DEIS (February, 1980) did address and the final plan and EIS clearly will address the management of ORVs in the CDCA, including areas "open" and "closed" to them as well as restrictions on travel in other areas.

12-2 For BLM to permit the proposed action, Patton Trail Alternative or any ORV point-to-point race through the CDCA prior to final CDCA plan decisions made with the benefit of public review and comment is to make a farce of the now ongoing public review process and to prejudice, or even potentially foreclose options regarding, final decisions concerning highly significant aspects of the CDCA plan.

Of utmost concern in this regard, is BLM's sudden and new intent as evidenced by the proposed action and Patton Trail Alternative considered in the DEIS to permit special ORV events to travel "cross-country" in the CDCA, even through WSAs and areas still under wilderness review.

The proposed CDCA plan (February, 1980) limited motorized vehicle use to "designated roads and ways" in Class L (Limited Use) areas and to "existing roads and ways or designated routes" in Class M (Moderate Use) areas. ORV free play was limited to designated "open" areas.

12-2 Subsequently, the California State Director, Jim Ruch, informed members of the public (CDCA briefing, Washington, D.C., August 25, 1980) that the as yet unpublished revised CDCA plan provides for restriction of motorized vehicle use in Class L (Limited Use) areas to "approved routes of travel." Clearly, if BLM permits the Johnson Valley to Parker Motorcycle Race to proceed, "cross-county" through Class L areas as proposed prior to the close of comment upon the revised CDCA management plan and final BLM decisions, it will prejudice, if not simply pre-determine, the definition of "approved routes of travel" through Class L areas. As many important and sensitive wildlife habitats will be included in Class L areas we find this situation unacceptable. Further, as WSAs will be managed as Class L areas until Congress determines their ultimate

12-3 designation, BLM effectively will be opening all WSAs to adverse impacts from special ORV events and seriously jeopardize its ability to protect their wilderness suitability and the resource values they contain.

Here we note, additionally, that BLM's rationale as expressed in the DEIS (see especially pp. IV-22-25) concerning the extent of additional adverse impacts anticipated in WSAs and the likelihood that wilderness suitability will be impaired is extremely naive and should be thoroughly reevaluated.

We recommend, in particular, to BLM that the proposed action or Patton Trail Alternative will result in impairment of the wilderness suitability of WSA 304 A.

12-4 Additionally, the proposed action of the DEIS would prejudice final agency decisions concerning the protection of the highly significant Cadiz Dunes under the CDCA management plan. There is ample resource information to support protection for the important and sensitive vegetation and wildlife resources of this dune area. If the proposed action is permitted, the scars and resource destruction resulting from the race route will unquestionably prejudice and, in all likelihood prematurely delineate, the eastern boundary of any protective zone established for the Cadiz Dunes.

Conclusions

As discussed above, the Johnson Valley to Parker Motorcycle Race DEIS is inadequate because it fails to consider a reasonable range of alternatives. The adverse environmental impacts documented in the DEIS, particularly those affecting the wildlife of the CDCA, of the proposed action or Patton Trail Alternative are unacceptable to Defenders of Wildlife. While the adverse impacts are unacceptable on their face they are indefensible in light of BLM's complete failure to consider reasonable alternatives which would avoid unnecessary degradation of important wildlife resources and other fragile resources of the CDCA.

In addition to the above, running of the Johnson Valley to Parker Motorcycle Race, or any similar point to point race through the CDCA, will unfairly prejudice final decisions on highly significant aspects of the management plan for the CDCA and subvert the ongoing public involvement process.

In light of these serious problems, Defenders strongly recommends to BLM that it adopt the "No Race Alternative" at this time. Any other alternative will unduly jeopardize the resources of the CDCA and violate BLM's public trust responsibilities.

RESPONSE:

12-1 See pages II-23, 24, 25.

12-2 When possible routes were being examined for this race course, the draft Desert Plan was available for review and efforts made to avoid conflicts, notably with potential Areas of Critical Environmental Concern (ACEC), WSAs and areas that likely would be closed to motorized vehicle travel.

The proposed Desert Plan will recommend that 17% of the public land in the CDCA be recommend for wilderness (Class C) designation, and 49% for Class L. Choices for any reasonable environmentally sound competitive course routes (as provisioned for in the ICMP and in the future in terms of the Desert Plan) would be seriously constrained by the original draft guidelines for the multiple use zones. They were modified so that the options for long distance competitive events would not be foreclosed when the Desert Plan is approved.

12-3 All proposed actions that will affect a WSA are analyzed on a case by case basis. If WSA 304A should be crossed through by any permitted event, it can not be assumed that such an action will take place in others as a result.

12-4 See page II-10.

Sunrise, Mt. McKinley Ansel Adams

SIERRA CLUB
LEGAL DEFENSE FUND, INC.

311 California St. Suite 311 San Francisco, California 94104 (415) 398-1411

SAN FRANCISCO OFFICE

Fredric P. Sutherland
Executive Director

Laurens H. Silver
Michael R. Sherwood
Julie E. McDonald
Staff Attorneys

Vawter Parker
Litigation Coordinator

Paula Carrell
Assistant Litigation Coordinator

Deborah S. Reames
Legal Assistant

311 California St.
Suite 311
San Francisco, CA 94104
(415) 398-1411

ROCKY MOUNTAIN OFFICE

H. Anthony Ruckel
William S. Curtiss
Staff Attorneys

335 Republic Building
1612 Tremont Place
Denver, CO 80202
(303) 892-6301

WASHINGTON, D.C. OFFICE

Frederick S. Middleton, III
Karin P. Sheldon
Howard I. Fox
Staff Attorneys

1424 K St., NW
Suite 600
Washington, D.C. 20005
(202) 347-1770

ALASKA OFFICE

Stephan C. Volker
Staff Attorney

419 6th St.
Suite 321
Juneau, AK 99801
(907) 586-2751

September 12, 1980

Mr. Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
Post Office Box 305
Needles, California 92363

Dear Mr. Crowe:

This letter constitutes our comments on the Draft Environmental Impact Statement prepared by the B.L.M. in connection with the proposed Johnson Valley to Parker Motorcycle Race. Our comments address only several of the more serious problems we find with the draft E.I.S. and the race proposal. They should be considered supplementary to the comments of the Sierra Club, which we incorporate herein by this reference.

We find the Johnson Valley to Parker Draft E.I.S. seriously deficient in meeting the requirements of the National Environmental Policy Act (NEPA). Furthermore, we are convinced that approval of either the proposed race alternative or the Patton Trail alternative would be in violation of both the California Desert Vehicle Program (the ICMP) and section 603 of the Federal Land Policy and Management Act (FLPMA). Such approval would additionally be inconsistent with the California Desert Conservation Area planning process.

The National Environmental Policy Act

13-1 The Johnson Valley to Parker Draft E.I.S. does not meet the requirements of NEPA in several respects. Most critical is its failure to develop and analyze reasonable alternatives to the proposed action. Alternative identification and assessment is the cornerstone of the NEPA process, as continually pointed out by the

Council on Environmental Quality (CEQ) in its regulations implementing NEPA. The CEQ regulations direct federal agencies to:

> "Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." [§1500.2.]

In preparing environmental impact statements, federal agencies are required by CEQ to "[s]tudy, develop and describe appropriate alternatives" to a proposed action [§1501.2(c)]. CEQ also directs that environmental impact statements

> ". . . shall inform the decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." [§1502.1.]

13-1 Furthermore, after emphasizing that alternative identification and assessment "is the heart of the environmental impact statement" [§1502.14], CEQ requires that agency E.I.S.s:

> "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated." [§1502.14(a).]

Thus, in order to satisfy NEPA requirements, an E.I.S. must identify, describe and objectively assess the full range of reasonable alternatives to a proposed action. It must inform the public and decisionmakers of those alternatives which would minimize adverse environmental impacts. If such alternatives have been eliminated from detailed consideration, an E.I.S. must provide the reasons for their elimination.

The Draft E.I.S. for the Johnson Valley to Parker Motorcycle Race ignores all of these requirements. It considers only two "alternatives" to the race course proposed by the event sponsors. One of these is the obligatory "no action" alternative (i.e., no race), while the other alternative, as described in the E.I.S., "is identical to the proposed action save a minor change in course alignment" [p. 1]. The Draft E.I.S., then, actually considers only whether to approve or reject the motorcycle race as proposed by the event proponents. It fails to identify and assess any reasonable alternatives.

Such alternatives do exist. In the context of past considerations of large-scale motorcycle races through this area, several alternative courses have been fully developed and suggested. Last year, B.L.M. itself proposed one such alternative race route, while varous conservation groups proposed several other alternative courses which eliminated or minimized environmental impacts in certain areas of special concern (e.g.: the Cadiz-Danby area). All of these alternatives were reasonable, and all of them would minimize the anticipated adverse environmental impacts of the proposed action. **13-1**

Yet the 1980 Johnson Valley to Parker D.E.I.S. fails to describe or evaluate any of these alternatives, as mandated by NEPA. It fails to inform the public and the decisionmakers of "The reasonable alternatives which would avoid or minimize adverse impacts" [§1502.1], and it fails to provide any explanation for its elimination of these alternatives from detailed discussion. Because of this complete absence of discussion of more environmentally sound reasonable alternatives to the proposed action, the Johnson Valley-Parker Draft E.I.S. is simply not acceptable under NEPA.

Perhaps B.L.M. would not have been in this position had it followed the "scoping" procedures also mandated by NEPA. As detailed in the CEQ regulations, NEPA requires that:

> "There shall be an early and open process for determining the scope of issues to be addressed [by an E.I.S.] and for identifying the significant issues related to a proposed action. This process shall be termed scoping. As soon as practicable after its decision to prepare an environmental impact statement and before the scoping process the lead agency shall publish a notice of intent [to prepare an E.I.S.] . . . in the Federal Register . . ." [§1501.7, emphasis added.]

3-2

The CEQ regulations further emphasize that the public is to be given full opportunity to participate in the scoping process [§1501.7(a)(2)]. B.L.M. completely ignored these scoping requirements in connection with its consideration of the proposed Johnson Valley to Parker Motorcycle Race. Instead, contrary to the express direction of the CEQ regulations, B.L.M. filed a Federal Register notice of its intent to prepare an E.I.S. for the proposed race after it had already completed the scoping process, noting simply that: "Scoping of issues was performed by BLM without formal public participation." [45 Federal Register 48266 (July 18, 1980).] Again, this is not acceptable under NEPA. There are sound reasons for the requirement of public participation in the scoping process, such as the facilitation of early development of reasonable alternatives to the proposed action, to be later discussed by the Draft E.I.S.

CEQ directs that:

13-2

> "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion." [§1502.9(a).]

Certainly the complete failure of the Johnson Valley to Parker Draft E.I.S. to provide any identification and evaluation of reasonable alternatives -- "the heart of the environmental impact statement" [§1502.14] -- renders the document "so inadequate as to preclude meaningful review". Because of this, it is our position that the Bureau can comply with NEPA at this point in the process only by preparing and issuing for public review a revised draft statement which describes and evaluates all reasonable alternatives to the Johnson Valley to Parker Motorcycle Race as proposed by the event proponents. Of course, the full 45-day public comment period required by CEQ must be provided for review of this revised draft [§1506.10(c)].

The California Desert Vehicle Program

Until the finalization of the CDCA Desert Plan, all off-road vehicle use of the California desert is governed by the 1973 California Desert Vehicle Program, or "Interim Critical Management Plan" [ICMP]. Thus all O.R.V. management decisions -- including the approval of a Johnson Valley to Parker Motorcycle Race -- must comply with the provisions of the ICMP regarding the desert areas affected. **13-3**

Virtually all of the proposed Johnson Valley-Parker race course is routed through areas classified by the ICMP for O.R.V. use only on "designated roads and trails" or on "existing vehicle routes".1/ The Patton Trail alternative is also routed completely through "designated roads and trails" areas and "existing vehicle routes" areas. The ICMP explains that in "designated roads and trails" areas,

> "Vehicle travel is permitted only on roads and trails designated by the Bureau. Until designation is accomplished, vehicular travel is limited to existing routes as defined below."2/

13-3 Since no roads or trails have ever been designated in any of the areas traversed by the proposed or alternate courses, O.R.V. use in these areas is limited to existing routes only, defined in the ICMP as follows:

> "Existing vehicle routes are those established before November 1, 1973, with significant surface evidence of prior vehicle travel and a minimum width of two feet. Widening or extending of these routes is prohibited. If nature eliminates portions it does not exclude vehicle use."

Accordingly, any legally acceptable motorcycle race from Johnson Valley to Parker must be routed completely on "existing vehicle routes", as defined by the ICMP, and must be designed so as to ensure that the event will not result in widening or extending of those routes. Yet both the proposed JV-P course and the Patton Trail alternative course directly contradict these requirements in several respects.

The most glaring of these contradictions is the cross-country routing of portions of both of these courses. The

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1/ The mass start and early portion of the proposed and alternative courses are in the Johnson Valley Open Area, an area designated by the ICMP for essentially unrestricted O.R.V. use. However, this portion of the course is not discussed by the JV-P Draft E.I.S., which simply describes it as "sponsor option" and addresses only the portion of the course outside of the Open Area [E.I.S. Map 2.1a].

2/ See 1973 ICMP Map. The original 1973 ICMP Map has been updated by 1977 and 1978 revised ICMP Maps, which retain the definitions provided by the 1973 Map and quoted here.

JV-P Draft E.I.S. freely admits that 15 miles of the proposed course [p. II-1] and 9 miles of the Patton Trail alternative course [p. II-16] are routed "off existing routes" -- i.e., through areas with no vehicle routes at all.3/

This is a clear and undeniable violation of the ICMP, as the Bureau is well aware. In its 1979 Environmental Assessment Report for last year's proposed race,4/ the Bureau explained that it had to reject a portion of the proposed course because it

> ". . . cannot be considered viable due to the fact that it does not follow continuous existing roads and trails as designated for this area by the ICMP." [E.A.R., p. 35.]

13-3 There has been no change in this rule since last year; the ICMP has not been amended in this respect. Any motorcycle race from Johnson Valley to Parker must be routed exclusively on "existing vehicle routes". The fact that neither of the race alternatives considered by the Bureau's Draft E.I.S. meets this basic legal requirement is inexplicable; the E.I.S. certainly provides no discussion of the issue. This is unacceptable. The Bureau cannot legally approve either the proposed or alternative JV-P race courses without first eliminating all cross-country routing.

Even if this were accomplished, the proposed and alternative JV-P courses are still inconsistent with the ICMP in that major portions of both run on routes which do not qualify as "existing" under the ICMP definition. As explained in the Draft E.I.S., 42 miles of the proposed route [p. II-1] and 34 miles of the Patton Trail alternative route [p. II-16] are:

> "On old race course that has since been erased but is recognized as legal under BLM's Interim Critical Management Plan". [Id.]

The E.I.S. does not explain which old race course or courses make up these portions of the proposed and alternative routes,

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3/ The Bureau further makes a distinction in the Draft E.I.S. between cross-country travel through "undisturbed areas" and through "areas with many tanks and ORV tracks" [Tables 2.1 and 2.2]. This distinction is totally irrelevant; cross-country travel through these areas is prohibited -- regardless of the relative condition of the land.

4/ The proposed 1979 Ludlow to Parker event.

let alone specify which courses are followed by which sections of the routes. When asked for this information by telephone,5/ B.L.M. replied that it had no documentation regarding the location of pre-1973 race courses in the area,6/ but had been assured by the event sponsor (the A.M.A.) that pre-1973 courses could be pieced together to make up the present proposed route and it was "taking the A.M.A.'s word for it".7/

13-3 We adamantly disagree with the Draft E.I.S. assertion that these portions of the proposed and alternative race courses are "recognized as legal under the BLM's Interim Critical Management Plan". The E.I.S. provides no reasons for this conclusion and we certainly can find none. Indeed, we find every reason to believe that this routing is not permissible under the ICMP.

First of all, the Bureau has absolutely no evidence to establish that these old race courses ever constituted "existing vehicle routes" under the ICMP. Even if the B.L.M. was certain that these routes ever existed8/ and that they were established prior to November 1, 1973, it has no idea of whether they ever exhibited "significant surface evidence of prior vehicle travel and a minimum width of two feet", as required by the ICMP definition. And, even if the Bureau was sure that the routes did once meet the ICMP definition, they cannot find the routes now and they have no maps by which to establish the actual location of the routes. Thus the Bureau literally has no way of knowing whether the proposed and alternative JV-P courses actually run along the route of the old race course

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5/ Telephone conversation of Deborah Reames and Dick Crowe, Area Resource Manager, B.L.M., September 10, 1980.

6/ B.L.M. (Mr. Crowe) did state that all of these previous courses were from races held prior to 1973, the cut-off date for "existing vehicle routes" under the ICMP. This is, of course, contradictory to the information provided by the 1979 E.A.R. for this event, which purported to be relying on a 1975 race course -- a course not qualifying as "existing" under the ICMP.

7/ Id.

8/ The fact that the Bureau cannot find on-the-ground evidence of these race courses now strongly suggests that either they did not exist at all or they existed in radically different locations.

alignments. Most likely they do not, and allowing a race on either of these courses would therefore be impacting previously undisturbed lands. Clearly this is not the result contemplated by the ICMP's direction that O.R.V. use of these areas be restricted to "existing roads and ways".

And finally, even if the Bureau could establish that these old race courses did once qualify as ICMP "existing routes", and even if it could discover the exact alignment of the courses, they still would not be "existing vehicle routes" by virtue of the fact that they have been completely "erased", [to use B.L.M.'s description]. The ICMP definitely refers to routes "with significant surface evidence of prior vehicle travel and a minimum width of two feet". In the case of the JV-P "old race courses", there is no surface evidence of prior use. The ICMP does specify that vehicle use of "existing routes" is not prohibited where "nature eliminates portions" of the **13-3** routes. But this certainly does not apply to the total elimination of all evidence of a route![9] We maintain that under such circumstances these courses are simply no longer ICMP "existing vehicle routes" and cannot be used by off-road vehicles.

For these reasons, we contend that the 42 miles of the proposed JV-P course and the 34 miles of the Patton Trail alternative course which are routed along "erased old race courses" are not acceptable under the ICMP. These portions of the courses must be eliminated or realigned onto "existing vehicles routes" which qualify under the ICMP before the Bureau can approve a motorcycle race on either course.

Both the proposed JV-P course and the Patton Trail alternative course fail to comply with the ICMP in yet one other manner. The ICMP very specifically provides in connection with O.R.V. use of "existing vehicle routes" that "[w]idening or extending of these routes is prohibited." Either of the proposed or alternative JV-P races would result in considerable "widening" of the existing route, as acknowledged in the Draft E.I.S. As the E.I.S. points out, the race course width will be restricted to the existing route

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[9] Indeed, the fact that the ICMP refers specifically to portions of the route would indicate that it did not intend totally obliterated "routes" to be used by off-road vehicles.

13-3 width only where it runs on roads.10/ Where the course runs on trails or other routes, the E.I.S. explains that "the course width will be 25 feet or as required" [p. II-10].11/ Obviously the majority if not all of the routes included in the proposed and alternative courses are presently far less than 25 feet in width. Nevertheless, the E.I.S. admits that the proposed JV-P race would directly impact "a 20 to 25 foot-wide area" of width along most of the course [p. II-10], recognizing that "bunching of riders" will occur at times and that passing of riders will occur throughout the race course [p. II-12]. The official widening of existing routes from their present width to a width of 20 to 25 feet is simply not permissible under the ICMP.

Thus, if the Bureau is to legally authorize a Johnson Valley Motorcycle race, it must first not only re-route the cross-country and "old race route" portions of the course as described above to align it totally on existing vehicle routes under the ICMP, but also narrow the course to the existing route width and take measures to ensure that widening of the route will not result from running of the race. Approval of either the proposed JV-P course or the Patton Trail alternative course as described in the Draft E.I.S. would constitute a clear violation of the 1973 Interim Critical Management Plan for off-road vehicle use of the California desert.

§603 of FLPMA and the Interim Management Policy

13-4 As noted on page III-33 of the Draft E.I.S., "[f]ive wilderness study areas (WSAs) would be affected to some extent" by the running of the Johnson Valley to Parker Motorcycle Race. The routing of the proposed course and the Patton Trail alternative is identical through most of these areas. The course runs along the borders of WSAs 207 and 307 and across WSAs 304, 304A and 305 [p. III-33]. A portion of the course through WSA 304A is routed cross-country. Through the rest of WSA 304A and through WSA 305, the majority of the routing is not on existing

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10/ E.I.S., p. II-10. On page IV-22, the E.I.S. "assumes" that the course would be "restricted to the bounds of an existing route" through wilderness shaded areas, but does not specify whether or how that will be accomplished.

11/ At another point, the E.I.S. states that: "A 200 foot-wide corridor (100 feet on either side of the course centerline) comprises the considered course." [Id.]

routes but instead "follows as closely as possible the route used for similar races in 1972 and 1975" [p. III-34, 42].12/

These five wilderness study areas were identified in the Final California Desert Conservation Area Wilderness Inventory conducted pursuant to the 1976 Federal Land Policy and Management Act [FLPMA]. Until a final determination of the wilderness suitability or nonsuitability of these areas is made by Congress, the Bureau is directed by section 603 of FLPMA to manage the areas "in a manner so as not to impair the suitability of such areas for preservation as wilderness" [43 U.S.C. §1782(c)]. B.L.M. has termed this FLPMA mandate the "nonimpairment standard".

13-4 In order to implement this mandate, B.L.M. has published the "Interim Management Policy and Guidelines for Lands under Wilderness Review" (the "IMP"). The IMP states that a proposed action meets the FLPMA nonimpairment standard only if: (1) it is temporary; (2) any "temporary impacts" resulting from the action are capable of being reclaimed "to a condition of being substantially unnoticeable in the wilderness study area"; and (3) when the action ends and the reclamation is complete, "the area's wilderness values must not have been degraded so far, compared to the area's value for other purposes, as to significantly constrain the Secretary's recommendation with respect to the area's suitability or nonsuitability for preservation as wilderness" [IMP, p. 15].

The Interim Management Policy also provides specific guidance with regard to the running of off-road vehicle competitive events through wilderness study areas, noting that

> "Based on past practice, it is expected that ORV events involving cross-country travel (off existing ways and trails) as part of the route would rarely satisfy the nonimpairment criteria." [IMP p. 17, emphasis added.]

The IMP does allow for such events, however, "if the BLM determines that the event can and will be carefully controlled to ensure that it fully satisfies the nonimpairment criteria" and

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12/ Of course, this routing is not acceptable under the Interim Critical Management Plan, which confines O.R.V. use in these areas solely to existing routes established before November 1973 "with significant surface evidence of prior vehicle travel and a minimum width of two feet". See pages 5-9, *supra*.

only with the proviso that "[a]ny impacts caused by the event must be reclaimed as specified in the nonimpairment criteria."13/

The JV-P Draft E.I.S. concludes that a large scale motorcycle race running through WSAs 304, 304A, and 305 would meet the FLPMA/IMP nonimpairment criteria because the action is temporary and because, even without any reclamation work, "the disturbances an annual race would create would still be substantially unnoticeable in each WSA as a whole" [p. IV-23]. The Draft E.I.S. provides no meaningful discussion or convincing information in support of this conclusion. Instead, it argues that:

13-4

(1) the percentage of land in each WSA impacted by the race [*e.g.*, at least 150 acres in WSA 304A] would be relatively small;

(2) the WSAs already have sustained "similar existing impacts";

(3) the proposed and alternative courses follow "as closely as possible" previous but now-invisible race courses, and the fact that these routes have been eliminated indicates "a high likelihood of natural erasure in most segments"; and

(4) "The nature of the terrain is such that visual changes would not be significant."

[Draft E.I.S., pp. IV 23-24.]

These statements cannot be substantiated and do not suport a conclusion of nonimpairment under the IMP. To begin with, the relative *amount* of a WSA receiving human impacts is completely irrelevant in terms of assessing whether those impacts constitute impairment of the area's wilderness values. The IMP does not reference percentage of land affected as a factor in determining nonimpairment. Clearly it is possible to have impacts or "intrusions" in WSAs which seriously impair the area's wilderness quality while taking up only a very small amount of the area. Nevertheless, after citing the small percentages of land in each WSA which would be impacted by the

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13/ IMP, pp. 18-19, emphasis added. Of course, the assembly areas, start and finish lines and gasoline pit stops associated with such events are expressly prohibited in WSAs by the IMP. [*Id.*]

proposed motorcycle race, the Bureau merely asserts that "the additional amount of disturbance would not be noticed" [p. IV-23]. We remain unconvinced. In WSA 304A, for example, the race would impact a fifteen-foot wide strip of land running for 13½ miles. It is difficult to imagine how a scar of this magnitude "would not be noticed".

As its second reason for concluding that the JV-P race impacts would be substantially unnoticeable, the Bureau claims that the affected WSAs "have similar existing impacts that cover much greater areas on the whole than would be impacted by the proposed action" [p. IV-24]. This statement is inconsistent with the CDCA Final Wilderness Inventory narratives for the areas in question here, as well as with descriptions of the areas provided elsewhere in the Draft E.I.S. These sources indicate that existing impacts in the WSAs are confined to random O.R.V. scars and vehicle tracks. Existing impacts do not include continuous 15-foot wide motorcycle race courses, as will be created if the JV-P race is allowed to traverse the areas. Existing impacts in these areas are not "similar" to those that will result from the running of this race. Even if
13-4 they were, that fact alone would have little to do with whether or not the additional impacts occurring because of the race would be substantially unnoticeable.

As indicated above, the Bureau also makes certain arguments regarding the routes of past races which passed through these WSAs, assuring us that any approved race course would follow these old routes "as closely as possible". Unless these old routes are easily identifiable on the ground and unless the "new" JV-P race was run on the exact alignment of these routes, we fail to see the relevance of their existence. If the "new" race is not run exactly upon these routes, it will create routes of its own, thereby further degrading the wilderness value of the areas. If these old routes cannot be identified on the ground, the same result will occur. New scars will be made. In either case, the degree of impairment of the wilderness quality of the areas will be the same as if these past races had never occurred (if, in fact, they did occur).

However, B.L.M. argues that the fact that it cannot find evidence of most or any of these old race routes only emphasizes the transitory nature of the impacts of such events. First of all, we continue to maintain that B.L.M. cannot find the routes of these old races because they simply were not run through these areas. B.L.M. does not know where these races were routed; it is simply "taking the AMA's word" (see supra). Considering that single tank tracks created by Patton maneuvers in the WSAs are easily discerned, and considering that the route of the 1974 Barstow to Vegas motorcycle event, run over similar terrain, is still clearly visible, it is highly improbable that these old races were actually routed through these areas. Secondly, even if these past events were held in the WSAs, they were undoubtedly of a magnitude much smaller than that of the proposed 1980 race in numbers of participants. Thus, even if these routes actually were "erased by nature", it does not mean that the 1980 route will be similarly obliterated through time. Again, the present considerable evidence of tank tracks and other very old vehicle routes indicates otherwise. And finally, if the Bureau feels that evidence of past motorcycle races in an area does not impair the area's wilderness values, why did it exclude the portion of WSA 307 containing the Parker 400 race route?14/

13-4 The Bureau's last reason for determining that the JV-P motorcycle race would not result in substantially noticeable impacts is that the "nature of the terrain is such that visual changes would not be significant", since "vegetation is [so] sparse" that "a course would not create any noticeable new lines in the landscape" [p. IV-24]. The absurdity of this argument is obvious. If this were at all true, it is difficult to understand why the single O.R.V. tracks pictured in E.I.S. figures 3.7-3.10 are so easily spotted. It is equally difficult to reconcile this argument with the statement on page IV-3 of the Draft E.I.S. that "[a]nnual races would create a visible strip of compacted soil" in WSA 304A.

The IMP nonimpairment criteria also require an assessment of the cumulative impacts of a proposed action on any affected WSAs. B.L.M.'s discussion of cumulative impacts is virtually non-existent, consisting only of a statement of the issue followed by the conclusion that "[c]umulative impacts would not be so great as to create a problem of suitability or nonsuitability" [pp. IV-23-24]. This is not adequate under the IMP. Furthermore, this conclusion contradicts the E.I.S.'s far more extensive treatment of the cumulative effects of an annual JV-P race on the soils [IV-2-5], vegetation [IV-14-16] and wildlife [IV-18] of the area as a whole. In these E.I.S. sections, the indicated cumulative impacts are considerable, certainly constituting impairment of the wildernes quality of the area.

To summarize this discussion thus far, B.L.M. has shown only that the JV-P Motorcycle Race meets the first of the three IMP nonimpairment criteria -- *i.e.*, that "it is temporary". The Bureau has *not* established that the proposed race meets the

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14/ Instead, that route is used as a boundary of the WSA.

second criteria that "[a]ny temporary impacts caused by the activity must, at a minimum, be capable of being reclaimed to a condition of being substantialy unnoticeable in the wilderness study area". B.L.M. has claimed that the JV-P race impacts would be substantially unnoticeable even with no reclamation efforts. As established above, this conclusion is totally erroneous. The impacts of this race will be clearly noticeable in each WSA traversed by the course. Accordingly, if a JV-P race is to be conducted through these areas, B.L.M. must first establish that these impacts can be reclaimed to the point where they actually are substantially unnoticeable. Since B.L.M. took the erroneous position that the race impacts would be negligible in these WSAs, it did not address the problem of reclamation. In order to meet IMP nonimpairment criterion #2, B.L.M. must explore this problem and make a showing that reclamation efforts will be practical and effective before it can issue its approval of either the proposed or the Patton Trail alternative routes.

13-4 Finally, we must also add that the Bureau has also not shown that the JV-P race can meet the third and last IMP criterion. In fact, the Bureau seems not to understand this criterion, which provides that:

> "When the activity is terminated, and after any needed reclamation is complete, the area's wilderness values must not have been degraded so far, compared with the area's values for other purposes, as to significantly constrain the Secretary's recommendation with respect to the area's suitability or nonsuitability for preservation as wilderness."

B.L.M. appears to be misinterpreting this criterion to require only that an area must still qualify for wilderness designation after an action affecting it has ended and any necessary reclamation of impacts has been accomplished. In other words, the Bureau indicates that this criterion is met by the JV-P race because the WSAs affected will not be impacted "enough to have dropped these areas from further consideration as a potential wilderness area if they [the impacts] had existed at the time of BLM's intensive inventory" [p. IV-24].

This is not the standard set by IMP nonimpairment criterion #3 [although we would argue that the JV-P race does not meet even this standard]. The Bureau has misinterpreted the criterion. The issue of whether or not an area would still have been included on the wilderness inventory had the antici-

13-4 pated impacts of a proposed action existed at the time of the time of the inventory -- i.e., the issue of whether the area would still qualify for wilderness designation -- is addressed by the second IMP criterion [substantially unnoticeable impacts]. The third criterion asks whether a proposed action will affect the fate of a WSA in the wilderness study phase of the review process, where the relative wilderness value of the area is balanced against its value for other multiple purpose uses to determine whether it should actually be designated as a Wilderness Area or released to the other uses. Under this criterion, the running of the 800-motorcycle Johnson Valley to Parker race through these WSAs will almost skew this balancing process. The resulting impacts will both reduce the areas' wilderness values and increase their value as O.R.V. use areas. This is not acceptable under the third IMP requirement, and the failure of the JV-P race to meet this standard alone would render its approval improper under the Interim Management Policy and FLPMA nonimpairment criteria.

The California Desert Plan

13-5 While the Final Environmental Impact Statement for the CDCA Desert Plan should be issued before the scheduled date of the proposed Johnson Valley to Parker Motorcycle Race, the Plan will not be finalized by that time. We consider it totally inappropriate for the Bureau to be considering approval of a large scale, point to point desert motorcycle race before the Desert Plan is adopted in final form. We feel strongly that B.L.M. should wait until the Desert Plan is finalized before it permits a motorcycle race of this magnitude to run through the CDCA. To act now would be directly contradictory to the Congressional intent expressed in FLPMA that the Bureau protect CDCA areas from degradation pending the completion of the Desert Plan.15/

15/ This intent is reflected in section 601(a)(6) of FLPMA, which provides that ". . . additional management authority must be provided to the Secretary to facilitate effective implementation of such planning and management." (43 U.S.C. 1781(a)(6), emphasis added). Section 601(b) confers such "additional management authority" by vesting the Secretary with a present duty to provide for the "immediate and future protection and administration of the public lands in the California desert within the framework of a program of multiple use and sustained yield, and the maintenance of environmental quality" [emphasis added]. This special management duty to maintain the environmental quality of the CDCA during the preparation of the Plan supplements the general duty vested in the Secretary, pursuant to Section 302(a), to manage the public lands under principles of multiple use and sustained yield and under Section 302(b) to prevent "unnecessary or undue degradation" of the public lands.

13-5 In conclusion, we do wish to emphasize our view that the Bureau cannot legally approve either the proposed Johnson Valley to Parker Motorcycle Race or the Patton Trail Alternative as presented in the Draft E.I.S. We sincerely hope that our comments receive the Bureau's full consideration.

Very truly yours,

Deborah S. Reames

Deborah S. Reames

DSR:cc

cc: Frank Gregg, B.L.M. Director
James Ruch, State Director
Gerry Hillier, Riverside District Manager
Larry Williams, C.E.Q.

RESPONSE:

13-1 See pages II-23 and II-25.

13-2 See page I-2

13-3 See page II-28

13-4 It is important to note that WSA 304A, even though impacted by material sales sites with graded pits, vehicle routes that wander through the area, tank tracks in the northeast, etc., was still recognized as meeting the 2(c) criteria of the Wilderness Act of 1964. One of those criteria (a roadless area with more than 5000 acres of public land) is important to note. The inventory determined that routes of travel created solely by the passage of vehicles are not roads.

If a track 15 feet wide and 9 1/2 miles long is sufficient to exclude an area from wilderness consideration, as suggested in the Sierra Club's Legal Defense Fund letter, as many as 50% of the WSAs in the CDCA would never have been designated as such.

13-5 See page II-28.

United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
PACIFIC SOUTHWEST REGION
SAN FRANCISCO, CALIFORNIA 94102
450 Golden Gate Avenue Box 36062

IN REPLY REFER TO:

PSW 200
DES 80/50

Memorandum

To: District Manager, Bureau of Land Management, Riverside, California

Attention: Area Manager, Cima Resource Area Office

From: Regional Director, PSWRD

Subject: Review of Draft Environmental Impact Statement for Johnson Valley to Parker Motorcycle Race.

We have reviewed the subject document and offer the following comments for your consideration.

General Comments

We believe that the preferred alternative does not adequately protect significant natural and cultural resources while providing a compatible recreational experience. Mitigation measures and monitoring procedures appear inadequate to protect the Amboy Crater National Natural Landmark, and the Vidal Junction and Lavic Archeological Districts.

14-1 We also question elimination of less destructive alternative routes, proposed by the Bureau of Land Management and Geological Survey, from consideration because they do not meet the approval of the event promoters. Elimination of other alternatives for this reason is not justified under the provisions of the National Environmental Policy Act.

Monitoring Program

We commend the Bureau of Land Management for the proposed monitoring program presented on page II-15. However, without a detailed baseline data and predicted resource disturbance, the monitoring program appears to have little value. The final environmental statement should include a detailed description of adverse impacts (destruction of flora, fauna, soil profile, cultural resources, etc.), that would warrant discontinuation of the race, evident after examination and evaluation of the sample plots.

14-2 We also believe that the monitors stationed along the course during the race should be identified in the final environmental statement. Will the monitors be BLM staff members, American Motorcycle Association members, county sheriffs, private security guards, or scientists familiar with the desert environment? The enforcement ability and concern for protection of significant resources of the monitors may be subject to question.

National Natural Landmarks Program

Amboy Crater, a designated National Natural Landmark, would be crossed by the proposed race course. The impact on this landmark resulting from increased ORV use can be expected to compound the threats to the integrity of the site. Amboy Crater was listed in the Section 8 Report for 1978 (in compliance with Public Law 91-383 as amended) as a damaged or threatened natural landmark.

14-3 We suggest that the race course be altered to avoid the Amboy Crater National Natural Landmark. The Bureau of Land Management has previously expressed willingness to comply with the Memorandum of Agreement between the National Park Service and the BLM (July 13, 1972) to protect designated landmarks. We believe that the State Director, BLM, should take appropriate action to protect this landmark.

Page III-34 should also be changed to reflect previous designation of this site to the National Registry of Natural Landmarks in April 1973. Classification of Amboy Crater as "eligible for designation" rather than "designated" is incorrect.

Cultural Resources

14-4 We appreciate BLM's recognition as noted on page IV-30 that cultural resources are non-renewable and that once disturbed, their scientific, educational, and interpretive value is diminished or lost. Impacts to cultural resources with both the proposed and alternative routes would result in such a loss. Even minimal impacts can dramatically affect the fragile environmental system of the area, and if the race becomes an annual event these impacts would be cumulative. Impacts on the spiritual identity and ambiance of the land in relationship with the culture of the area's Native Americans is also a major concern.

The course should be surveyed and routed with the maximum impact from long term use in mind, especially if the race might encourage increased ORV use of the area. Flagging archeological sites along the course so that they can be avoided is questionable since this would draw attention to the sites and possibly encourage vandalism. Instead routing the course for maximum avoidance of sites and flagging the course to confine the potential area of impact is suggested. Measures to mitigate vandalism should also be considered more fully.

Summary Comments

We suggest that the race be delayed until next year to allow time for completion of the California Desert Conservation Area Master Plan. Finalization of land use designations, examination of alternative race courses, monitoring of sample survey plots, and testing of new soil restoration and revegetation techniques can all be accomplished during the intervening period.

cc: Regional Environmental Officer, Pacific Southwest
Office of the Secretary, USDI

14-1 See page II-25.

14-2 Monitors will be BLM resource specialists, including rangers.

14-3 One section declared eligible for National Landmark designation will be crossed on existing routes.

14-4 See pages II-27 and IV-21.

AMA
AMERICAN MOTORCYCLIST ASSOCIATION

P.O. Box 141, Westerville, Ohio 43081
Telephone (614) 891-2425
Telex: 245392

September 11, 1980

15

Mr. Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
P.O. Box 305, Front Street
Needles, California 92363

Dear Mr. Crowe:

The American Motorcyclist Association is pleased to have the opportunity to submit comments on the Draft Environmental Impact Statement on the proposed Johnson Valley to Parker motorcycle race. It is well known that this association has long held that such an activity, when conducted under manageable conditions, is a legitimate recreation which should be accommodated in the California Desert.

Within the body of our comments, we will try to address those concerns expressed by the California Desert Advisory Committee during their scheduled meeting of August 7-8, 1980 and those of the sponsoring organizations which have been discussed at meetings subsequent to the release of the Draft EIS. We believe that concerns of both organizations can be alleviated without major revisions to the Draft thereby precluding a major rewrite of the document.

We believe that the desirability and need for the proposed event was best expressed by those who attended the public hearing at San Bernardino on September 4, 1980. The overwhelming support for the event should in itself serve as justification for the issuing of the BLM permit.

Should there be specific questions regarding our comments, please do not hesitate to contact us.

Sincerely yours,

Robert Rasor
Associate Director
Government Relations

RR/bg

Enclosure

COMMENTS OF THE
AMERICAN MOTORCYCLIST ASSOCIATION

Draft Environmental Impact Statement
Johnson Valley to Parker
Motorcycle Race

Among the critical questions posed by the proposed event is, "Why should such an event occur during the final review of the Desert planning process?" Without question, the conducting of such an event at this time presents risks both for the sponsoring organizations and for the Bureau of Land Management. We believe that the risks are not only justified but necessary.

Point-to-point motorcycle racing has been a part of recreation in the California Desert from the early part of this century. Unfortunately, during the development of the Desert Plan such activities have been prohibited until such time as resource inventories and planning developments were complete enough to provide a broad data base which could identify a suitable course to accommodate such an event.

The development of the Desert Plan has provided that information base, and it must now be demonstrated, both by rider organizations and the BLM, that this activity can be integrated into the planning concept envisioned by Congress. We believe that the accommodation of the proposed event during the final review will generate the best public "statement" as to the suitability and manageability of these activities.

In addition, the event will provide major new information bits that can be utilized in future decisions and planning steps on the California Desert Conservation Area.

Concern for fuel consumed was expressed by a member of the Desert Advisory Committee relative to the BLM's authorizing such an activity during a national effort to conserve energy.

While the expressed concern may be legitimate, there is no justification to substantiate it. In a recent study done by the Department of Transportation designed to measure fuel consumed by off-road vehicles, less than two percent of that consumption could be attributed to motorcycle use. Further, the report strongly suggested that alternate leisure time trade-offs would be likely to consume greater amounts of fossil fuel. Based on this report, we do not feel that fuel consumption should be regarded as an issue in the permit decision.

PROPOSED ACTIONS AND ALTERNATIVES

The proposed course alignment and alternatives have been discussed in detail, both in meetings subsequent to the release of the EIS and at the September 4 public hearing.

We are in support of those minor course alterations suggested by members of the Checkers Motorcycle Club and District 37.

1) SCE transmission lime road from Johnson Valley Open Area to U.S. 66.

2) Rerouting course 100 feet south of U.S. 66 and run parallel to it for approximately two miles before joining the railroad maintenance road.

3) Relocation of pit to intersection of Bagdad Road and proposed course.

4) Relocation of course in Bristol Dry Lake Area to avoid water bars along Amboy Road.

5) Relocation of Pit 2 to southern end of Bristol Dry Lake.

We take exception to the alternatives proposed by the Sierra Club prior to the September 4 public hearing. Their concerns for the sensitivity of the dune environment on the southeast section of the Cadiz dunes were discussed in detail in the Cadiz/Danby Lake EAR of 1976. The management decision following that EAR permitted competition on approved BLM courses.

The course, as proposed, would actually cross very little of the sensitive area identified by the Sierra Club and should remain intact if at all possible.

If the BLM chooses to respond to the possibility that the dune system will be closed to ORV use under the yet to be released Desert Plan, we would recommend a separate alternative rather than accept the one proposed by the Sierra Club.

Such an alternative would include utilizing the Patton Trail beginning at that point where the course intercepts the Patton Trail Alternative at the north end of Cadiz Valley and follow it south.

15-1 At that point where the Patton Trail intercepts the portion maintained by Delta Chemical Company as a "haul road," the course would be realigned to continue south on Picadilly Road to Pit 3.

Such an alternative would avoid both the sensitive areas in the Cadiz Dunes and alleviate concerns expressed by Delta Chemical Company of increased vehicle use on their maintained road.

Efforts should also be made to shift Pit 3 from the vicinity of Patton Trail one and a half miles southeast to the old Patton landing strip.

AFFECTED ENVIRONMENT

Rare and Endangered Species - Concern has been expressed over the presence of both plant and animal species that may be impacted by the proposed course.

Course alignment is flexible enough to avoid the presence of identified species of plants or unique features such as the "King Kong" creosote rings. Provisions to adequately protect these have been built into the course and the EIS.

Actual likelihood of disturbance or destruction of identified species seems insignificant when it is realized that 94 percent of the identified course is designated as existing roads, trails, or previously utilized race courses.

From the perspective of wildlife concerns, Wilbur Mayhew, PhD., professor of zoology at University of California at Riverside and member of the California Desert Advisory Committee, is on record from the August 7-8 meeting of the Committee as stating the proposed course is less likely to damage wildlife than others previously considered:

> "From a wildlife point of view, this area is better than others."

15-2 WSA 304A, Amboy Crater - Portions of the Amboy Crater have been nominated as a possible National Landmark. Six sections of the crater are included in this nomination and all are avoided by the proposed course.

Previously filed appeals of the WSA status of this area have been dropped leaving it free for management under Interim Wilderness Management Guidelines. Provisions of these guidelines permit cross country racing provided the impacts of that activity do not affect the "suitability" of the area for wilderness consideration.

Because of the WSA status and national landmark nomination, course restrictions will be the greatest as they traverse this area. EIS recommendations include limiting the marked course to 15-25 feet. Under the criteria for wilderness, in the event any impact occurs, it clearly will not impair the area's suitability as wilderness. The presence of the course will not limit opportunities for primitive or unconfined recreation, nor will it impair future opportunities for solitude. The presence of an "ORV scar" will not qualify as a "road" and has not prevented similar "intrusions" from being incorporated as WSAs.

UNAVOIDABLE ADVERSE IMPACTS

We believe that those impacts identified as "unavoidable" within the EIS are far outweighed by the positive social and economic opportunities provided by the proposed event.

Increased levels of dust, oxidants, and carbon monoxide levels are greatly overstated by the EIS. While there will be temporary increases of these airborne elements, each will eventually dissipate to previous levels.

The majority of those competitors who will participate in the proposed event would, in all likelihood, compete in a similar event on the same weekend should the proposed event fail to materialize. The end result would be same number of riders and vehicles participating in another portion of the CDCA.

SUMMARY

We believe that a major point-to-point motorcycle race can occur within the prescription of the California Desert Plan and that organized motorcycle clubs can conduct the event in a manageable, environmentally sound fashion.

The American Motorcyclist Association, its southern California affiliate, District 37 Sports Committee, Inc., and the Checkers Motorcycle Club have sought an opportunity for over six years to demonstrate that such an event is a suitable recreational activity in the California Desert. Further, we believe that the proposed course, with minor modification, can meet the needs and desires of the off-road motorcycling community that has long been a traditional user of the California Desert. Only by permitting the proposed event to occur can it be demonstrated that our critics' concerns are far in excess of reality and that these type of events are manageable and within acceptable environmental limits.

RESPONSE:

15-1 See page II-22.

15-2 See pages III-37 and III-45.

CORVA
CALIFORNIA OFF ROAD VEHICLE
ASSOCIATION, INC.

Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
P.O. Box 305, Front Street,
Needles, Ca. 92363

September 11, 1980

Sir;

This document constitutes the official position and comment of the California Off Road Vehicle Association (CORVA) on the Draft Environmental Impact Statement for the Johnson Valley to Parker Motorcycle Race. CORVA, with some reservations, supports the proposed action. We could support the Patton's Trail Alternative if, as will be noted, certain conditions are met.

It is gratifying to see the Bureau finally abandoning its stance of "banning" major point-to-point competitive events. It is unfortunate that it took so much conflict and confrontation to effect this change. We hope that the Bureau can now begin to give due and fair consideration to the rights and needs of the ORV community.

CORVA wants to make perfectly clear that we do not consider that the granting of a permit for this race fills any kind of "quota" for long-course competitive events. Statements by Dr. Kenneth Norris, while advising BLM on ORV matters, and Ms. G. Smith, member of the Desert Advisory Committee, have indicated that there is some belief that this one race should and will be the only long-course competitive motorcycle event permitted. CORVA totally disagrees with this position. The number of such events should be solely a function of user demand, with permits being granted on a case by case basis, after considering all the factors involved.

It should also be noted that this event has no bearing on the demand for a Barstow to Vegas race. The issues are, and will remain, totally separate. We condemn the efforts of the Bureau to force the promoters of the "Check Chase" to hold the event in November, in conflict with the traditional date for the Barstow to Vegas. We believe that this is being done only to stem the protests against the Bureau's policies and actions, which have occurred on the weekend following Thanksgiving, without resolving the issues involved.

16-1 We have serious reservations concerning the wisdom of expending $15,000-$16,000 from the recreation program during FY 1981 for one event. This amount seems grossly excessive. We would like to see some projections on what new data or conclusions these studies are expected to show. Many such studies have already been done and, while we do not necessarily agree with the conclusions, certain impacts have been described and attributed to ORV events. Will these studies significantly alter our current level of knowledge?

16-1 Bias and prejudice has always been a factor in past BLM studies. How will ORV interests be protected from such effects in the proposed monitoring program? Who will be conducting the monitoring program?

In general, CORVA believes that a monitoring program of this scope will achieve no useful benefit, especially as the race will occur, in large part, on existing routes of travel. The money could be better spent in other areas.

16-2 We cannot condone the Patton's Trail Alternative, unless specific measures are taken to protect the racers from "potential interaction" with the salt trucks. The Bureau's comment that it is the sponsor's responsibility is totally irresponsible. An acceptable solution would be to arrange for the stoppage of the salt truck traffic for the period of time the racers would be in the area.

After having reviewed the course outline for the proposed action, we believe that the potential for significant adverse impacts is minimal, assuming that the racers remain on the course.

The proposed race procedures and mitigating measures appear to be quite adequate to insure that the event will be run in a responsible manner with minimal impact. We can see no reason to reject a permit for the proposed action, assuming adequate assurances can be given of full compliance with the permit stipulations.

CORVA thanks you for the opportunity to participate and comment on this matter. We would like to receive a copy of the final EIS and copies of any reports generated by a monitoring program in this area. We shall await your final decision with great anticipation.

For the Association,

Richard T. Goehnaur
Secretary: Southern Region
8202 Vista del Rosa
Downey, Ca. 90240

RESPONSE:

16-1 See pages II-19 through 21. The monitors will be BLM employees.

16-2 See page II-22.

United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

17

SEP 11 1980

Memorandum

To: Area Manager, Cima Resource Area Office
Bureau of Land Management
Needles, California

Through: Assistant Secretary--Energy and Minerals SEP 12 1980

From: Director, Geological Survey

Subject: Review of draft environmental statement for a Johnson Valley to Parker, California, motorcycle race

We have reviewed the draft statement as requested in your letter of August 1.

It is our opinion that the proposed race on either of the alternative courses would have adverse impacts on the geologic environment. The most significant impacts would be disturbance and compaction of soil with accompanying wind erosion, and increased susceptibility to both wind and water erosion into the indefinite future. We recommend that the proposed monitoring program be expanded to include monitoring of soil impact and soil erosion.

These concerns are discussed in the enclosure.

for H. William Menard

Enclosure

One Hundred Years of Earth Science in the Public Service

17-1 Page II-14, 15. The proposed monitoring program should provide for soil-impact monitoring (which would require a description of what is there now as well as post-event study), and for monitoring of water and wind erosion.

Page II-16, Mitigation Measures, Item 1. The critical amount of moisture in the upper 10 cm should be specified for each principal soil type, and monitored through the course.

17-2 Page III-4, 6. Examination and description of soils should be for all soil-terrain associations crossed by the proposed route.

Page III-7. Deposits in washes and dunes should not be described as "cohesionless." Differences in cohesion sufficient to stabilize dry-wash deposits to wind erosion in contrast to actively eroding deposits in adjacent interfluves have been reported in unpublished U.S. Geological Survey studies in arid lands. Even these types of deposits are subject to destabilization by vehicular travel and their natural state is not entirely lacking in stability.

17-3 Page IV-2, Soils. Even a single passage of a vehicle commonly causes significant compaction and lasting compaction in sandy desert soils may be incurred by as few as 10 vehicle passes. Data from controlled experiments as well as field observations indicate very rapid increase in compaction with initial vehicle impacts. This is further supported by a large literature on vehicle impacts on agricultural soils.

Page IV-3, par. 2. Our observations indicate that the assertion that "Some compaction may occur in portions of washes but virtually no compaction would occur on dunes" is an understatement for washes and incorrect for dunes. The dune systems are very complex assemblages of terrain-soil types and cannot be simply characterized. Virtually every type of wash deposit that we have examined undergoes significant compaction and loss of surface strength from vehicular use.

Page IV-3, par. 4. The statement that increases in water erosion of areas newly disturbed by the proposed event are not expected to be substantial should be considered in light of the observation on page III-34 (last par.) that the surface of the bajada traversed by Segment 1 is "dissected by innumerable braided washes." The natural condition is a guide to vulnerability. In addition, this discussion should give an indication of the relative importance of direct mechanical erosion.

Whether the sediment yielded by erosion of disturbed zones is moved off slope or not is less relevant to impact assessment that destruction of soil structure and texture even by slight movement, winnowing out of organic components of disturbed soil, burial of downslope soils and vegetation, and the incremental approach to threshold conditions that may accelerate natural erosion.

Although rocky mantles may resist water erosion, they are highly sensitive to mechanical displacement (for example, Afton Canyon, Shadow Mountains).

Page IV-4. The studies showing increased biomass as a result of "water harvesting" by roadways have not dealt with the total hydrologic system affected. Harvesting in one place means denial of the usual supplies downslope, so that complementary decrease of biomass must be sought over broad downslope areas and not just in the disturbed zone of the roadway.

Page IV-4, par. 3. The production of a protective surface layer of rock may take a very long time.

Page IV-5, par. 1. Corridors 15 feet in width, much less the 200-foot zone allocated by the proposed route plan, are adequate to serve as wind fetches even where oriented normal to the wind direction.

Page IV-18, Cumulative Impacts. This assessment should address the cumulative effects of reimpacting old disturbances (military) that have been in the process of recovery for nearly four decades.

RESPONSE:

17-1 See page II-20.

17-2 See Tables 3-5 and 3-6.

17-3 The data referring to single passages refers to 4 wheel drive vehicles, not to motorcycles.

THE WILDERNESS SOCIETY

FOUNDED IN 1935

18

September 11, 1980

Dick Crowe, Area Manager
Cima Resource Area Office
Bureau of Land Management
P.O. Box 305, Front Street
Needles, California 92363

Dear Mr. Crowe:

The Wilderness Society would like to comment on the proposed annual point-to-point motorcycle event from Johnson Valley to Parker. Although we oppose this race because of the deleterious effect it would have on the environment, there are certain alterations which, if made, would significantly reduce the worst impacts. Our concern is for those areas which would receive a particularly high impact were the race to be run through them.

Studies made long before the draft Environmental Impact Statement on the California Desert Conservation Area (CDCA) was issued have demonstrated that desert areas are particularly vulnerable to overland recreational vehicles (ORV's). The latter dangerously compact the sands, breaking the surface crust and reducing air packets, thus causing increased erosion and loss of vegetation. These effects then have cumulative impacts on other parts of the environment, particularly the wildlife that relies on the soil for burrows and the vegetation for cover.

Particularly vulnerable on the proposed course would be the Cadiz Dunes. Dunes are so far relatively unstudied as ecosystems. They provide a unique ecosystem, supporting many endemic or adapted species. The Wilderness Society was gratified to hear that the Cadiz Dunes will now be out of bounds as a result of the CDCA final EIS.

However, we do not feel that the Patton's Trail Alternative would adequately mitigate the impact of the race. One must remember that the proposal is for an annual event. The optimistic estimates of the impairment of the environment are based on three years of above average rainfall. Furthermore, the Patton's Trail Alternative borders a Wilderness Study Area (WSA 305) that is recommended as wilderness in the final CDCA EIS. The whole area is interspersed with various sensitive resources, such as the California Rare and Endangered plants along the course, creosote rings (the ones in the Johnson Valley are proposed for ACEC designation in the CDCA draft EIS), lava flows, archaelogical sites, wildlife, etc. Although the Cadiz Dunes are no longer endangered, the course still would run from the approximate area of Pit 3 towards and along the western edge of the Iron Mountains, then circling around their northern tip. In Map 4.1c of the draft EIS, this part of the course is described as "visibly undisturbed or

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(202) 828-6600

undisturbed desert, or high impact possible." This definition is also given to the southern part of the course traversing the Cadiz Dunes. This impact would be avoided if, for example, the Sierra Club's proposed alternative, negotiated last year, were used. This alternative would run down the eastern side of the Kilbeck Hills and the western side of the Danby Dry Lake, rejoining the proposed course at the northeastern tip of the Iron Mountains. Since the position of Pit 3 and the course at the southern end of the Patton Trail Alternative are being challenged by mining interests, such an arrangement would also settle that problem.

18-1 Appendix 10b(iii) of the Appendices to the CDCA draft EIS gives rise to another worry. Despite assurances that the course will be kept to and that the course will be kept to and that there will be checkpoints to assure compliance with the rules, past experience is not so sanguine: "In November 1979, the BLM was unable to prevent a cross-country motorcycle race that violated restricted motor vehicle use areas along the entire course despite advance warning, a court injunction, and the presence of BLM rangers. If public compliance with vehicle use restrictions does not change or if the Bureau does not accomplish more effective enforcement, many of the areas designated for vehicle use on existing roads and trails will continue to be de facto open areas with impacts much greater than those described above." (pp. 278-9).

The same appendix details the effects of ORV's on animals: crushing of animals and burrows, destruction of vegetation needed for cover, deafening leading to dislocation of the senses, avoidance of previous habitat, etc. The impact is not restricted to the used corridor. Among the animals affected are the Desert Tortoise (a BLM sensitive species) and the Golden Eagle and the Panamint Kangaroo Rat (both nominated BLM sensitive species). The Desert Tortoise is, in addition, under status review by the Office of Endangered Species.

In conclusion, The Wilderness Society feels that the impact of the proposed race on the environment of the CDCA would far outweigh the advantages of the point-to-point competition. The area traversed by the proposed course is rich in the various elements described in the CDCA draft EIS, many of them in need of more protection. We therefore feel that it would be best not to run the race. We also feel that the alternatives to the proposed course in the draft EIS, apart from the Patton's Trail Alternative, should have been described and their advantages or disadvantages noted. It would have strengthened the EIS and its recommendation.

Sincerely,

Peter Kirby

Peter Kirby
National Forests Issues Specialist

RESPONSE:

18-1 The race referred to was done outside of BLM's permit/environmental analysis system. The intent of the Johnson Valley to Parker EIS is to provide a fully mitigated, controlled event that avoids the problems described, such as impacts to wildlife. If no controlled events are permitted, uncontrolled events will likely continue to occur.

The Metropolitan Water District of Southern California

Office of the General Manager

SEP 12 1980

19 Mr. Dick Crowe
Area Manager
Bureau of Land Management
P. O. Box 305
Needles, California 92363

Dear Mr. Crowe:

Johnson Valley to Parker Motorcycle Race

We have reviewed the EIS prepared for the Johnson Valley to Parker Motorcycle Race and offer the following comments for your consideration.

We believe that the EIS adequately addresses environmental impacts associated with Federal lands. However, it is impossible to determine the exact course route from the drawings in the text. The Colorado River Aqueduct is a major feature of this portion of the desert and should be shown on your drawings and referred to in your text, especially as your course route parallels the Aqueduct for the final 16 miles or so.

It is understood that an addendum to this EIS is being prepared to satisfy California Environmental Quality Act requirements. Please send us a copy of this addendum when it is available so we can make specific comments, if needed.

Should you have any questions, please contact Mr. Glen Smith, Principal Engineer, Environmental Planning Branch at (213) 626-4282, extension 455.

Very truly yours,

Evan L. Griffith

Evan L. Griffith
General Manager

PEB/ro

1111 Sunset Boulevard, Los Angeles, Calif. / Mailing address: Box 54153, Los Angeles, Calif. 90054 / Telephone: (213) 626-4282

LIST OF PREPARERS

NAME	TITLE	QUALIFICATIONS/EXPERIENCE
Adams, John	Soil Scientist	Ph. D., Soil Science/4 years
Bailey, John	Outdoor Recreation Planner	B.A., Cultural Anthropology/ 6 years
Bicket, James	Wildlife Biologist Team Lead	M.S., Zoology/5 years
Emery, Donald	Botanist	B.S., Biology, Forestry/18 years
Frank, Paul	Botanical Technician	B.A., Biology/1 year
Lawrence, Keith	Wildlife Technician	B.S., Wildlife Resources/3 years
Mur, Joel	Outdoor Recreation Planner, EIS Production Coordinator	B.S., Natural Resource Recreation/ 7 years
Musser, Ruth	Archaeologist	B.A., Anthropology/3 years
Taylor, Marianna	Native American Coordinator	M.A., Anthropology/11 years
Winters, Duane	Hydrologist	M.S., Hydrology/4 years

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APPENDICES

A. VEGETATION

B. WILDLIFE

C. CULTURAL RESOURCES

D. NATIVE AMERICAN CONCERNS

E. WILDERNESS

APPENDIX A-1

PLANT SPECIES LIST IN JOHNSON VALLEY TO PARKER STUDY AREA

Scientific Name	Common Name
Acacia greggii	cat's-claw acacia
Acamptopappus sphaerocephalus	goldenhead
Ambrosia dumosa	burrobush, bursage
Asclepias albicans	white-stemmed milkweed
Asclepias erosa	desert milkweed
Bebbia juncea	sweetbush
Brandegea bigelovii	brandegea
Cassia armata	desert cassia, desert senna
Cercidium floridum	border palo verde
Chilopsis linearis	desert willow
Coldenia plicata	plicate coldenia
Cucurbita palmata	palmate-leaved gourd
Dalea californica	California dalea
Dalea emoryi	Emory dalea
Dalea mollis	silk dalea
Dalea mollisma	silky dalea
Dalea parryi	Parry dalea
Dalea spinosa	smoke tree
Ditaxis serrata	saw-toothed ditaxis
Echinocactus polycephalus	niggerheads cactus
Echinocereus engelmannii	calico cactus, hedgehog cactus
Encelia farinosa	brittlebush

Appendix A-1 (cont.)

Scientific Name	Common Name
Encelia frutescens	rayless encelia
Ephedra californica	California joint fir
Ephedra nevadensis	Nevada joint fir
Euphorbia polycarpa	small-seeded sand-mat
Fagonia laevis	smooth-stemmed fagonia
Ferocactus acanthodes var. acanthodes	barrel cactus
Fouquieria splendens	ocotillo
Heliotropium curassavicum var. oculatum	Chinese pusley
Hilaria rigida	big galleta-grass
Hymenoclea salsola	cheesebush
Hyptis emoryi	desert lavender
Krameria grayi	white ratany
Krameria parvifolia var. imparata	little-leaved ratany
Larrea tridentata	creosote bush
Lycium andersonii	Anderson thornbush
Mammillaria tetrancistra	corkseed cactus
Olneya tesota	desert ironwood
Opuntia basilaris var. basilaris	beavertail cactus
Opuntia bigelovii	teddy-bear cholla
Opuntia echinocarpa	thorny-fruited cactus
Opuntia ramosissima	pencil cholla, Christmas cactus
Petalonyx thurberi	Thurber sandpaper plant
Phoradendron californicum	desert mistletoe
Pluchea sericea	arrow-weed

Scientific Name	Common Name
Prosopis glandulosa var. *torryana*	honey mesquite
Salazaria mexicana	paper-bag bush
Sphaeralcea ambigua ssp. *ambigua*	desert mallow
Stephanomeria pauciflora	desert straw
Stillingea linearifolia	linear-leaved stillingea
Tridens puchellus	fluffgrass
Trixis californica	trixis
Abronia villosa	hairy sand verbena
Allonia incarnata	windmills
Amsinckia teselatta vernicosa	shiny-seeded fiddleneck
Baileya pleniradiata	wild marigold
Bouteloua barbata	six-weeks grama
Camissonia boothii var. *decorticans*	woody bottle-washer
Chaenactis fremontii	Fremont pincushion
Chorizanthe brevicornu	brittle spine-flower
Chorizanthe rigida	rigid spiny-herb
Cryptantha angustifolia	narrow-leaved forget-me-not
Cryptantha maritima	white-haired forget-me-not
Cryptantha micrantha	purple-rooted forget-me-not
Datura meteloides	jimson-weed
Eriogonum deflexum	skeleton weed
Eriogonum inflatum	desert trumpet
Eschsholzia minutiflora	little golden poppy
Geraea canescens	desert sunflower

Appendix A-1 (cont.)

Scientific Name	Common Name
Langloisia punctata	spotted langloisia
Mentzelia involucrata	sand blazing-star
Mohavea confertiflora	ghost-flower
Monoptilon belloides	Mohave desert-star
Nicotiana trigonophylla	desert tobacco
Oenothera deltoides	dume primrose
Oligomeris linifolia	linear-leaved cambess
Orobanche cooperi	burroweed strangler
Palafoxia linearis	Spanish needle
Perityle emoryi	Emory rock daisy
Phacelia crenulata	notch-leaved phacelia
Physalis crassifolia	thick-leaved ground cherry
Plantago insularis	Indian wheat, woolly plantain
Psathyrotes ramosissima	velvet rosette
Salvia columbariae	chia
Sarcostemma hirtellum	rambling milkweed
Schismus arabicus (SCHI)	Arabian schismus
Stillingea spinulosa	broad-leaved stillingea
Thelypodium lasiophyllum var. *utahense*	hairy-leaved crucifer
Tamarix pentandra	salt cedar
Yucca brevifolia	Joshua tree
Dalea polyadenia	dotted dalea
Dalea fremontii	Fremont dalea
Hoffmannseggia microphylla	small-leaved Hoffmanseggia

Appendix A-1 (cont.)

Scientific Name	Common Name
Peucephyllum schottii	desert-fir
Suaeda torreyana var. ramosissima	inkweed
Hibiscus denudatus	rock hibiscus
Mamillaria vivipora var. alversonii	nipple cactus
Grayia spinosa	spiny hop-sage
Beleperone californica	chuparosa
Thamnosna montana	terpentine broom
Viguiera deltoidea var. parishii	Parish viguiera
Machaeranthera tortifolia	Mojave aster
Yucca schidigera	Mojave yucca
Allenrolfea occidentalis	pickleweed
Croton californica	desert croton
Cynanchum utahense	
Ditaxis lanceolata	lance-leaved ditaxis
Hesperocallis undulata	desert lily
Lepidium fremontii	Fremont peppergrass
Mirabilis bigelovii	wishbone bush
Pholisma arenarium	pholisma
Tricoptilium incisum	yellow heads
Antirrhinum filipes	twining snapdragon
Baileya pauciradiata	lax flower
Bouteloua aristidoides	gramma grass
Camissonia brevipes	yellow cups
Dyssodia cooperi	Cooper's dyssodia

Appendix A-1 (cont.)

Scientific Name	Common Name
Erodium texanum	desert heron's bill
Eschsholtzia caespitosa	gold poppy
Gilia stellata	star gilia
Langolisa matthewsii	desert calico
Layia glandulosa	white layia
Lepidium lasiocarpum	peppergrass
Lupinus arizonicus	Arizona lupine
Malacothrix glabata	desert dandelion
Mentzelia albicaulis	stick-leaf
Mimulus bigelovii	desert monkey flower
Nama demissum	purple mat
Oenothera cardiophylla	heart-leaved primrose
Oenothera brevipes	desert primrose
Pectocarya platycarpa	comb-bur
Phacelia distans	common phacelia
Rafinesquia neomexicana	
Salsola iberica	Russian thistle
Senecio mohavensis	Mohave groundsel
Stanleya pinnata	Prince's plume
Stephanomeria exigua	small stephanomeria
Trichoptilium incisum	yellow head
Menodora scoparia	smooth menodora

APPENDIX B-1

CRITERIA FOR SIGNIFICANT WILDLIFE SPECIES

Common and Scientific Name	Federally listed Endangered/Threatened Species	State listed Endangered/Rare Species	California BLM Sensitive Species	CDFG Fully Protected	Audubon Blue list	Limited Numbers due to position on food chain	Limited Numbers due to restricted habitat
Reptiles:							
Desert Tortoise *Gopherus agassizi*			X	X			
Mohave Fringe-toed Lizard *Uma scoparia*							X
Shovel-nosed Snake *Chionactis occipitalis*							X
Birds:							
Western Grebe *Aechmophorus occidentalis*					X		
Brown Pelican *Pelecanus occidentalis*	X	X		X			
Bald Eagle *Haliaeetus leucocephalus*	X			X		X	
Golden Eagle *Aquila chrysaetos* *			X	X		X	
Red-tailed Hawk *Buteo jamaicensis*						X	
Swainson's Hawk *Buteo swainsoni* *			X		X	X	
Marsh Hawk *Circus cyaneus*					X	X	
Prairie Falcon *Falco mexicanus*					X	X	

Appendix B-1 (cont.)

Common and Scientific Name	Federally listed Endangered/Threatened Species	State listed Endangered/Rare Species	California BLM Sensitive Species	CDFG Fully Protected	Audubon Blue list	Limited Numbers due to position on food chain	Limited Numbers due to restricted habitat
American Kestrel *Falco sparverius*					X	X	
Loggerhead Shrike *Lanius ludovicianus*					X	X	
Long-eared Owl *Asio otus*						X	X
Short-eared Owl *Asio flammeus*					X	X	X
Burrowing Owl *Speotyto cunicularia*					X	X	
Great-horned Owl *Bubo virginianus*						X	
Barn Owl *Tyto alba*					X	X	
Elf Owl *Michrathene whitneyi* *			X			X	
Vesper Sparrow *Pooecetes gramineus*					X		
Yellow Warbler *Dendroica petechia*					X		X
Mammals:							
Bobcat *Felis rufus*						X	
Mountain Lion *Felis concolor*						X	

Appendix B-1 (cont.)

Common and Scientific Name	Federally listed Endangered/Threatened Species	State listed Endangered/Rare Species	California BLM Sensitive Species	CDFG Fully Protected	Audubon Blue list	Limited Numbers due to position on food chain	Limited Numbers due to restricted habitat
Kit fox *Vulpes macrotis*				X		X	
Coyote *Canis latrans*						X	
Ringtail *Bassariscus astutus*				X		X	
Nelson Bighorn Sheep *Ovis canadensis nelsoni* *			X	X			X
Gray Fox *Urocyon cinereoargenteus*						X	
Badger *Taxidea taxus*						X	
Panamint kangaroo rat * *Dipodomys panamintinus*			X				

* Species proposed for inclusion on the California BLM Sensitive List.

APPENDIX B-2

WILDLIFE SPECIES BY HABITAT TYPES

Common Name and Scientific Name	Habitat Type							
	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Dry Wash	Yucca Creosote	Comments
REPTILES								
Banded Gecko *Coleonyx variegatus*			P	P	V	P	V	
Desert Iguana *Dipsosaurus dorsalis*		P	V	V	V	V	V	
Chuckwalla *Sauromalus obesus*					V	P	V	Rocky Outcrops
Zebra-tailed Lizard *Callisaurus draconoides*		P	P	V	V	V	V	
Mojave Fringe-toed Lizard *Uma scoparia*			V	V		V		Loose Sand
Collared Lizard *Crotaphytus bicinctores*				P	P		P	
Long-nosed Leopard Lizard *Gambelia wislizenii*				P	P	V	P	
Desert Spiny Lizard *Sceloporus magister*						V	P	
Side-blotched Lizard *Uta stansburiana*		P	V	V	V	V	P	
Long-tailed Brush Lizard *Urosaurus graciosus*		P	V	V	V	V		

P=Species whose presence was not verified, but expected to occur.

V=Species which have been verified.

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Drywash	Yucca Creosote	Comments
Rosy Boa *Lichanura trivirgata*			P	P		P	P	
Spotted Leaf-nosed snake *Phyllorhynchus decurtatus*			P	P	V	V	P	
Coachwhip *Masticophis flagellum*		P		P	V			
Western Patch-nosed snake *Salvadora hexalepis*			P	P	P	P	P	
Glossy Snake *Arizona elegans*				V	V		P	
Gopher Snake *Pituophis melanoleucus*				V	V	P	P	
Common Kingsnake *Lampropeltis getulus*				P		P	P	
Long-nosed snake *Rhinocheilus lecontei*				V	P		P	
Western Ground snake *Sonora semiannulata*			P	P		P		
Western shovel-nosed snake *Chionactis occipitalis*				V	V	V	P	
Night Snake *Hypsiglena torquata*				P	P	P	P	
Western Diamondback Rattlesnake *Crotalus atrox*				P	P	V	P	

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Cresote Bursage	Desert Drywash	Yucca Creosote	Comments
Speckled Rattlesnake *Crotalus mitchelli*					V		P	
Sidewinder *Crotalus cerastes*		V	V	V	V	V	P	
Mohave Rattlesnake *Crotalus scutulatus*				P			P	
Birds:								
Swainson's Hawk *Buteo swansoni*				P	P		P	
Turkey Vulture *Cathartes aura*		P	P	P	V	P	P	
Marsh Hawk *Circus cyaneus*			P	P				
Red-tailed Hawk *Buteo jamaicensis*		P	P	V	V	V	V	
Prairie Falcon *Falco mexicanus*		P	P	V	V	V	V	
American Kestrel *Falco sparverius*			P	P	P	P	P	
Mourning Dove *Zenaida macroura*			V		V	V	V	
Long-eared Owl *Asio otus*						P		

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Drywash	Yucca Creosote	Comments
Short-eared Owl *Asio flammeus*			P	P				
Barn Owl *Tyto alba*						V	P	
Burrowing Owl *Speotyto cunicularia*				V	V			
Great-horned Owl *Bubo virginianus*					V	P		near Iron mountain
Poor Will *Phalaenoptilus nuttallii*		P				P		
Lesser Nighthawk *Chordeiles acutipennis*					V	P	P	
White-throated Swift *Aeronautes saxatalis*				P				
Costa's Hummingbird *Calypte costae*			P	P	V	P	V	
Vermillion Flycatcher *Pyrocephalus rubinus*						P		
Western Kingbird *Tyrannus verticalis*			P			P	P	
Ash-throated flycatcher *Myiarchus cinerascens*			P	P		V	V	

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Drywash	Yucca Creosote	Comments
Say's Phoebe *Sayornis saya*			P	P	V	P	P	
Gray Flycatcher *Empidonax wrightii*				P		P	P	
Horned Lark *Eremophila alpestris*		P	V	V	V	V	P	
Barn Swallow *Hirundo rustica*						P	P	
Violet-Green Swallow *Tachycinetta thalassina*			P	P		P		
Tree Swallow *Iridoprocne bicolor*		P	P	P		P	P	
Common Raven *Corvus corax*		P	V	P	V	P	P	
Verdin *Auriparus flaviceps*						V	P	
Rock Wren *Salpinctes obsoletus*						V	P	
Mockingbird *Mimus polyglottos*			P	P		P	P	
Sage Thrasher *Oreoscoptes montanus*		P	P	P		P		
LeConte's Thrasher *Toxostoma lecontei*			V	V		P	P	

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Drywash	Yucca Creosote	Comments
Robin *Turdus migratorius*					V			
Swainson's Thrush *Catharus ustulatus*						P		
Black-tailed Gnatcatcher *Polioptila melanura*				P		V		
Ruby-crowned Kinglet *Regulus calendula*						P		
Water Pitpit *Anthus spinoletta*			P					
Phainopepla *Phainopepla nitens*						P		
Loggerhead Shrike *Lanius ludovicianus*		P	V	V	V	V	V	
Warbling Vireo *Vireo gilvus*						P		
Orange-crowned Warbler *Vermivora celata*						P		
Yellow Warbler *Dendroica petechia*						P		
Yellow-rumped Warbler *Dendroica coronata*			P	P	P	P		
Townsend's Warbler *Dendroica townsendi*						P		

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Drywash	Yucca Creosote	Comments
Hermit Warbler *Dendroica occidentalis*						P		
Black-throated Gray Warbler *Dendroica nigrescens*						P		
Yellowthroat *Geothlypis trichas*						P		
Hooded Warbler *Wilsonia citrina*					V	P		
Wilson's Warbler *Wilsonia pusilla*				P	V	P		
Yellow-headed Blackbird *Xanthocephalus xanthocephalus*						P		
Northern Oriole *Icterus galbula*						P		
Western Tanager *Piranga ludoviciana*						P		
Lazuli Bunting *Passerina amoena*						P		
House Finch *Carpodacus mexicanus*			P	P	V	P	P	
Savannah Sparrow *Passerculus sandwichensis*						V	V	

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Drywash	Yucca Creosote	Comments
Black-throated Sparrow *Amphispiza bilineata*		P	P	P	V	P	P	
Chipping Sparrow *Spizella passerina*			P			P		
Brewer's Sparrow *Spizella breweri*		P	P	P	P	P		
White-crowned Sparrow *Zonotrichia leucophrys*		P	P	P	P	P		
Song Sparrow *Melospiza melodia*		P						
Roadrunner *Geococcyx californianus*			P	P	V	V	V	
Mammals:								
Coyote *Canis Latrans*		P	P	P	V	V	P	
Kit Fox *Vulpes macrotis*		P	V	P	V	P	P	
Gray Fox *Urocyon cineroargenteus*		P	P	P	P	P	P	
Badger *Taxidea taxus*					V	P	P	

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Drywash	Yucca Creosote	Comments
Bobcat *Felis rufus*		P	P	P	P	P	P	
Ringtail *Bassariscus astutus*						P	P	
Black-tailed Jackrabbit *Lepus californicus*		V	V	V	V	V	V	
Cottontail *Sylvilagus audubonii*				P	P	P	V	
Round-tailed Ground squirrel *Spermophilus tereticaudus*		P	V	V	V	V	P	
White-tailed Antelope squirrel *Ammospermophilus leucurus*		P	V	V	V	V	V	
Botta Pocket Gopher *Thomomys bottae*						V	P	
Desert Kangaroo Rat *Dipodomys deserti*			V	V	V	V		
Merriam Kangaroo Rat *Dipodomys merriami*				V	V	V	V	
Panamint Kangaroo Rat *Dipodomys panamintinus*							P	

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Drywash	Yucca Creosote	Comments
Canyon Mouse *Peromyscus crinitus*			P		V	P	P	
Cactus Mouse *Peromyscus eremicus*				P	V	P	P	
Deer Mouse *Peromyscus maniculatus*			P	P	P	P	P	
Southern Grasshopper Mouse *Onychomys torridus*			V	V	P	V	V	
White-throated Woodrat *Neotoma albigula*						P	P	
Desert Woodrat *Neotoma lepida*				V	P	V	V	
Little Pocket Mouse *Perognathus longimembris*		P						
Long-tailed Pocket Mouse *Perognathus formosus*		P			V	V	V	
Desert Pocket Mouse *Perognathus penicillatus*		P	P	P	P	P	P	
California Leaf-Nosed Bat *Macrotus californicus*			P	P	P	P	P	
California Myotis *Myotis californicus*			P	P	P	P	P	

Appendix B-2 (cont.)

Common and Scientific Name	Playa	Playa Edge	Dunes and Sandhills	Creosote Flats	Creosote Bursage	Desert Drywash	Yucca Creosote	Comments
Big Brown Bat *Eptesicus fuscus*			P	P	P	P	P	
Western Pipistrelle *Pipistrellus hesperus*			P	P	P	P	P	
Pallid Bat *Antrozous pallidus*			P	P	P	P	P	
Brazilian Free-tailed Bat *Tadarida brasiliensis*			P	P	P	P	P	
Big Free-tailed Bat *Tadarida molossa*			P	P	P	P	P	

APPENDIX C-1

ARCHAEOLOGICAL SITES LACKING INTEGRITY OR SIGNIFICANCE

The following sites have some scientific potential in that their study could aid in reconstruction of part lifeways, refine knowledge of culture history, and contribute to studies of the cultural process. The sites, however, are limited in content and structure; thus their information potential is best fulfilled in a comparative framework. The sites are not likely to have social significance, as no features are visible, depth is either limited or nonexistent, burials are not indicated and no obviously diagnostic artifacts are present. The minimal scientific potential contained in these sites is best made a reality through recordation and description.

These sites are not considered to meet the National Register criteria as they are not likely to yield information of crucial importance to prehistory. Further the sites will not meet criteria a, b, or c. Further, the sites lack integrity of design, setting, materials, workmanship, feeling, and association.

LP-6. This site consists of a light density artifact scatter. All artifacts, except one core, are flakes/debitage. The scatter encompasses an area of approximately 1,000 square meters. Approximately 25 flakes/debitage were observed. No subsurface aspect was clearly apparent, although the site has a sandy substrate, and subsurface materials likely occur. Approximately 15 fragments of highly eroded tortoise bone were also observed, but these were not burned or otherwise clearly associated with cultural activities. The lithic materials present include a variety of chalcedony, including jasper, and clear and milky quartz.

LP-14. This site consists of a light density scatter of aboriginal artifacts encompassing an area of approximately 500 square meters. One core, 35 flakes/debitage, one mano, and five bone fragments (unburned, eroded, and possible tortoise) were observed. The mano specimen had been burned and broken. Lithic materials represented included a variety of chalcedony primarily an opaque white material. The majority of specimens are soft hammer secondary flakes.

LP-16. This site consists of a complex of at least eight rock features. All features are one course high. The largest is a circular alignment 17 meters in diameter. A roghly linear arrangement of five large rocks, oriented at 345 T, occurs in the center of this alignment. Another feature is solid rectangular pavement measuring 2.4 by 4.8 meters. Other associated features include two U-shaped alignments approximately three meters in diameter, two circular alignments of approximately two meters in diameter, and two amorphous arrangements.

The cultural affiliation of this site is problematic. An aboriginal chopper occurred in association with one alignment. On the other hand, a variety of historic material, including batteries, pieces of leather, cans, and other debris, were associated with the features.

LP-16 (cont.) The rock features at LP-16 lack definitive associations which would confirm cultural affiliation, have little scientific significance in and of themselves. The uniqueness and distinctiveness of the features can best be assessed through investigation and comparison with other such features, if these exist in the area.

The special significance of the site is limited without data by which it could be interpreted. LP-16 is not considered to meet the National Register criteria, as it lacks integrity of setting, feelings, and association. Further, it will not meet criteria a, b, or d.

PS-2. This site includes a prehistoric workshop associated with task related artifacts. The estimated projection of the total extent of the site is four acres. The site is disturbed by both a pipeline and powerline and their maintenance roads.

PS-3. This site consists of several tool production stations. Five flake scatters were observed in the ½-acre site. Hardaker (1980) observed two flaking techniques present--bipolar and percussion flaking. The site has been heavily impacted by the powerline maintenance road and two access roads (see site report).

PS-4. This site is primarily composed of worked jasper--two jasper flake scatters were observed in an area 15 meters away from the powerline road. Also present were several flakes and possible tools made of volcanic material (basalt or andesite). The site is not unusual for the area.

4-SBr-3248. This site consists of a small lithic scatter including five flakes of felsite, three flakes of chert, and two pieces of unburned bone. One of the flakes resembles a possible scraper. Flake density per 1x1 square meter is one flake.

4-SBr-410. This site was recorded by G. Smith (n.d.) and includes 10 acres of raw, natural quarry material used for producing prehistoric lithic tools. Tools located include scrapers and choppers. The site is easily accessed by the AT&SF railroad maintenance road. Because the site is located on a hill above the racecourse, no adverse impact on the site by the race participants is anticipated.

LP-7 and 8. This find consists of two trail segments. The trail is typically well defined on terrace surfaces and discontinuous in washes. The trail is approximately 35 centimeters wide. No artifacts were observed in association with the trail segments. Several hundred meters of trail segments are clearly traceable, although impacted by motorcycle use.

APPENDIX C-2

HISTORICAL SITES LACKING INTEGRITY OR SIGNIFICANCE

The following historical sites have little scientific or social significance due to the lack of variation and associations. The limited scientific significance of these features is considered achieved through recordation and description. These sites are not considered to meet the National Register criteria for nomination due to the lack of integrity of location, design, setting, or minimum information potential. Much of the material at these sites does not meet the minimum 50-year age requirement for historical sites.

LP-17. This find consists of a single antique auto. The make, model, and completeness of the speciment could not be assessed due to its partial burial in a wash. Based on examination of the fenders the auto dates between 1920 and 1930.

LP-18. This find consists of the rear portion of an antique auto circa 1920s.

LP-19. This is an historic site which consists of prospects, a stone cabin, and associated trash. The stone cabin is roofless and the remaining walls are approximately two meters high. The limited quantity of cultural material present indicates a post-1930 occupation.

LP-20. The Silverbell Mine is an extensive mining camp located just north of LP-19. The site is characterized by mining equipment, wrecked cars, foundations, rock-lined walkways, and associated scatter of trash. The materials present suggest post-1930 mining activities.

LP-23. This is an historic dump which is adjacent to the AT&SF railroad bed and may be associated with railroad construction. Noted at the dump are lead-plugged cans and a variety of glass and porcelain dating prior to 1930.

LP-25, Argos. This is an historic site which consists of foundations, a cemetery, and trash dumps associated with the AT&SF railroad. Materials observed at the site indicate a pre-1930 occupation. Argos is indicated on USGS maps and was apparently a railroad section station. The site has been heavily damaged by relic hunters. The cemetery consists of seven graves marked with weathered wooden crosses and ovate rock cairns. Flecks of a white substance, possibly plaster or thick whitewash, still adhere to the surface of the rock cairns. The cemetery is immediately adjacent to a dirt road south of the railroad tracks. There is no evidence of vandalism at this cemetery

LP-26. This site consists of an isolated antique automobile body. Only the rear of the vehicle is present and indicates a date of approximately 1930.

LP-27, Ragtown. Ragtown is an extensive historic site consisting of a series of mines, prospects, and associated cultural remains such as car wrecks, a foundation, rock cairns, trash dumps, and an old railroad bed. A cemetery is indicated on USGS maps; however, it could not be relocated during the present survey. Circa 1930 mining operations.

PHs-1. This site consists of recent historic tin cans, tobacco cans, fresh charcoal and campfire rings. This material is located near Lavic and is probably related to railroading activities at Lavic or to more recent rockhounding activities.

PHs-2. This site includes an historic rock alignment and initials spelled out with small stones. Associated with this site were a number of recent tin cans (approximately 20 years).

In addition to these finds and sites, observed was abundant evidence of World War II military training. Most common are fragments of shrapnel from 105 millimeter tank shells and other ammunition; also, C-ration cans abound. All along the Iron Mountains and southern Cadiz Valley military impacts are especially heavy.

LP-2. This site is popularly known as Patton's Camp. The site consists of various historic materials such as C-ration cans, wooden stakes, tent cloth, miscellaneous fragments of metal relating to World War II military training activities and personnel maintenance. Tent pegs and tent foundations are still in evidence, indicating a substantial camp or more than 40 tents, at least 8 by 10 feet in size. Abundant tank and vehicle tracks were noted around the site. The rows of tents were aligned to true north.

Historic site LP-2 has some scientific potential as it may provide ancillary information concerning the layout and structure of World War II military training camps. The site may have some social significance due to some feelings of association of those who trained there. The scientific potential of the site could be fulfilled through systematically mapping the site. The social significance of the site is likely to be limited, based on the fact that little remains other than the tent foundations to elicit associative feelings.

The site is not considered to meet National Register criteria for nomination as it lacks integrity of design, materials, and workmanship. Further, it is not likely to yield information important in history, nor will it meet criterion b.

4-SBr-2330. This site is a Chinese labor camp related to the construction of the Santa Fe Railroad. It includes Chinese pottery (collected) and fire hearths.

4-SBr-1905. (On public commentalternative). Naturally occurring jaspers located on a hill near US 66 were modified prehistorically during the production of stone tools. G. Smith (no date) reported having found prehistoric stone scrapers and choppers. Basalt artifacts were found by Hardaker including "roughly hewn 'ovate bifaces', large macroflakes, unifacially flaked edges (scrapers), and ridge backs." Some damage has been incurred from rockhounding activities.

APPENDIX C-3

ARCHAEOLOGICAL SITES OUTSIDE OF THE COURSE RIGHT-OF-WAY WHICH MAY BE INDIRECTLY AFFECTED

The following sites are located more than 1 mile away from the course but because of their visibility or familiarity could be indirectly affected on the race day by spectators/campers.

The ghost town of Saltmarsh was occupied during active mining operations in the late 1800s. A detailed archaeological and historical investigation most likely would provide information relevant to the understanding of the railroad and mining phases in Ward Valley and the general Mojave Desert. Saltmarsh is located only two miles off of the course and is easily accessed during the race by the AT&SF railroad. Nomination of this site to the National Register was made (Norwood, 1980). The site was found not to be eligible.

LP-21. This site consists of a rockshelter with an associated scatter of approximately 15 flakes. The shelter is heavily impacted by apparently recent occupation or extended camping. The rock shelter is approximately 3.5 meters wide, two meters deep, and two meters high. No artifacts were noted in the shelter; the flake scatter encompasses an area of approximately 600 square meters at the mouth of the shelter. The shelter occurs in a lava flow associated with the Pisgah Crater.

LP-28 and 29. These rock shelters may be the most significant prehistoric sites located during the survey as they may contain stratified subsurface deposits which could be placed in a cultural and temporal context. LP-28 and 29 appear to be undisturbed.

Appendix D-1: Position of the Colorado River Indian Tribes Regarding Land Use.

Resolution No. R-14-79

RESOLUTION

COLORADO RIVER TRIBAL COUNCIL

A Resolution to State the position of the Colorado River Indian Tribes concerning use, development, and access to public and private lands which are traditional use areas by interested members of the Tribes of the Colorado River Indian Reservation

Be it resolved by the Tribal Council of the Colorado River Indian Tribes, in special meeting assembled on March 16, 1979

WHEREAS, development or use of traditional lands both now and in the future may have impact on the Colorado River Indian Reservation and its people, and

WHEREAS, traditional use areas and sacred areas of the Tribes of the Colorado River Indian Reservation are not all contained within the external boundaries of the Colorado River Indian Reservation, and

WHEREAS, traditional Indian lands under consideration may also be sacred, and

WHEREAS, these sacred and traditional use areas hold continued importance to the Tribes and their descendents, and

WHEREAS, Tribal government is sovereign, and

WHEREAS, the Congress of the United States in recognition of Tribal sovereignty and tradition through an Act have established the right of Native Americans to practice their own religion (P.L. No. 95-341), and

The foregoing resolution was on March 16, 1979 duly approved by a vote of 5 for and 0 against, by the Tribal Council of the Colorado River Indian Tribes, pursuant to authority vested in it by Section 1(v), Article VI of the Constitution (or By-Laws) of the Tribes, ratified by the Tribes on ~~July 17, 1937~~ March 1, 1975, and approved by the Secretary of the Interior on ~~August 13, 1937~~ May 29, 1975, pursuant to Section 16 of the Act of June 18, 1934, (48 Stat. 984). This resolution is effective as of the date of its adoption.

COLORADO RIVER TRIBAL COUNCIL

By

Chairman

W. L. Murdock

Secretary

RECEIVED
SEP 27 10 00 AM '79

Approved:

Superintendent

WHEREAS, the State of California has established legislation to protect the Native American interests on Public Lands (Public Resources Code, Division 5, Chapter 1.75, as revised),

NOW, THEREFORE, BE IT RESOLVED that the Tribal Government will seek to secure for its people the right of access and review of use and development to determine if such use is compatible with traditional usage. Tribal Government will not abrogate the Indian people from these rights but will seek to perpetuate the traditional and sacred use of traditional lands.

APPENDIX E-1

FINAL DESCRIPTIVE WILDERNESS NARRATIVES, "CALIFORNIA DESERT CONSERVATION AREA WILDERNESS INVENTORY," BUREAU OF LAND MANAGEMENT
MARCH 31, 1979

AREA 207

I. PHYSICAL BOUNDARIES

The southern boundary of the Wilderness Study Area is the northern edge of the utility right-of-way which contains power transmission lines. This boundary is located along a line 400 feet north of the three existing transmission lines (except where a service road may extend outside the right-of-way). To the east, a maintained dirt road used as access to the Silver Bell Mine is the area border. The western boundary is a maintained dirt road between Camp Rock Road and Kane Spring. To the north, the boundary is a gas pipeline maintenance road.

II. LAND OWNERSHIP

The area is approximately 69 percent public lands. Non-public holdings occur in north-south strips of alternating sections.

III. DESCRIPTION OF ENVIRONMENT

The area encompasses the Rodman Mountains and minor alluvial formations at the northern and southern ends. The Rodman Mountains consist of an extensive series of ridges ascending from 2900 to 3000 feet near the northern alluvial slope of the Mojave Valley to 4906 feet on Pipkin Cinder Cone near the southern end of the area. A surrounding lava flow nearly bisects the area from northwest to southeast. This lava forms a mesa gently sloping to the northwest and has cliff-like sides, creating deep canyons along its perimeter. At several points along this perimeter, drainage channels flow over the escarpments, creating spectacular waterfalls during wet seasons. The Creosote Scrub community is represented on the alluvial slopes, while a transitional type, indicating the Joshua Tree Woodland association, is evident at higher elevations. South of Target Peak, the mountains drop sharply to 4200 feet and slope toward Johnson Valley. Several low hills in the far southwest corner of the area seem more closely associated with the northern end of the Fry Mountains than the Rodman Complex.

IV. NATURAL CONDITION

Man-made improvements are present over portions of the area. Large-scale mining activity has occurred in the southwest portion in the area north and west of Camp Rock Mine. These are located in low, scattered, highly eroded hills between the Rodman Mountains and Newberry Mountains and are highly visible scars upon the landscape. A dirt road, which is not maintained, leads to Pipkin Cinder Cone from the base of Target Peak. An abandoned cinder mine is located on the cinder cone. Apparatus associated with the mine still remains. Diggings from the mine are visible and are a major scar, as the disturbed areas have altered the shape and color of the cone. Some random vehicle tracks occur across the lava flow, but not to a degree which would make rehabilitation impracticable. The Pipkin Cinder Cone is excluded along with the western portion from a north-south line through Camp Rock Mine. These are areas where man's work dominates the landscape and have thus been excluded from the potential Wilderness Study Area boundaries. The boundaries of the potential Wilderness Study Area are common with the roadless area boundaries along the northern, eastern, and southern borders to Pipkin Cinder Cone. The cone is excluded and the boundary is again common to a point approximately one-half mile east of Camp Rock Mine. The boundary runs north from Camp Rock Mine through a wash and way to the northern boundary one-eighth mile east of BM 2855.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

Several aspects of the area enhance outstanding opportunities for solitude. Higher elevations offer outstanding vistas of the Mojave River Valley, Troy Lake depression, Newberry Mountains, Alvord Mountains, Cady Mountains, and the Pisgah Crater and lava beds. The deep canyons provide screening and isolation from other visitors. The topography of this area is varied and scenic, providing oustanding opportunities for primitive and unconfined recreation. Various degrees of challenge are offered, with

VI. SUMMARY OF PUBLIC COMMENTS

The many comments received recognized the natural values of the area, with the vast majority supporting the findings.

AREA 304

I. PHYSICAL BOUNDARIES

The area has an odd shape due to its location adjacent to the Marine Corps Base at Twentynine Palms, which forms the western boundary. Other boundaries include a graded road into the military base to the north and Amboy Road to the east. The southern border is a telephone line support road.

II. LAND OWNERSHIP

The area is approximately 80 percent public land. Non-public holdings occur in a checkerboard pattern near the eastern border, with scattered sections in the western one-half.

III. DESCRIPTION OF ENVIRONMENT

Landforms in the Bullion Mountains vary with rock type. The mountains contain both rugged, boulder, granitic rocks, and the more rounded metamorphic rocks. A large alluvial apron slopes eastward and westward on each side of the mountains. In the spring, the Cleghorn Lakes located in the interior of the Bullion Mountains are densely covered with fiddleneck. The rest of the area has a sparse cover of vegetation consisting mostly of cholla, creosote, and mixed shrubs.

IV. NATURAL CONDITION

The Bullion Mountains area generally retains its natural character throughout. Terrain variation in the mountain area and the overall size of the area screen out the influences of the few man-made features located within it. These features include a few primitive ways (one leading to the Cleghorn Lakes and a few in the Twentynine Palms area) and abandoned mines (including the Copper World Mine, of which only scattered debris remains). Overall, man's influence in the area is substantially unnoticeable. Excluded from further wilderness consideration is the area around Valley Mountain where scattered mining in the interior has reduced the apparent naturalness. Around the mountain, large areas have been substantially altered by off-road vehicle use. The boundary runs through the center of the large wash at the base of the Bullion Mountain bajada from the northwest corner of Section 2 (T. 2 N., R. 10 E.) to the southern end of Section 33 (T. 2 N., R. 11 E.). The narrow strip between Amboy Road and the Marine base boundary is also excluded.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

Outstanding opportunities for solitude and for a primitive and unconfined type of recreation occur within the area, especially in those portions where terrain variety provides visual screening. With both mountain and valley types of terrain in the area, primitive type recreation experiences can be either of the intimate, enclosed type or of the vast, open type. Opportunities for solitude are lacking in the small strip between Amboy Road and the Marine base boundary. No vegetative or topographic screening is available there.

VI. SUMMARY OF PUBLIC COMMENTS

Comments supported the findings and indicated potential for mineral and energy exploration.

AREA 304A

I. PHYSICAL BOUNDARIES

The western boundary consists of a military base right-of-way south from Bagdad and the Twentynine Palms Marine Corps Base; the southern boundary is a combination of the Marine Corps base and a road running west from BM 607 in Section 9 (T. 4 N., R. 12 E.), at Amboy Road; the eastern border is Amboy Road; the northern boundary is Highway 66.

II. LAND OWNERSHIP

The area is approximately 60 percent public land. Private sections occur in strips but do not interrupt the contiguous block of public land.

III. DESCRIPTION OF ENVIRONMENT

The area is dominated by the volcanic cinder cone, Amboy Crater, which is surrounded by extensive lava flows. The cinder cone and lava flows rest upon the lower portion of a relatively flat bajada. Vegetation is sparsely distributed on the bajada and even more scarce on the lava flows. Creosote and mixed shrubs dominate the area.

IV. NATURAL CONDITION

The eastern boundary of the potential Wilderness Study Area has been adjusted in order to exclude the salt extraction operations located on Bristol Dry Lake and random off-road vehicle scars adjacent to the highway. The remainder of the area generally retains its primeval character. Man's works, which include a few unimproved ways, and random tank tracks from military activity extending outside the boundaries of the Marine base, are substantially unnoticeable due to topographic variation in the lava flows and distance on the bajadas. There has been no mining of the cinder cone, so it remains relatively intact.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

Outstanding opportunities for solitude and for primitive and unconfined types of recreation are provided within the area especially in those portions where the terrain varies enough to screen out the outside influences and to screen area users from each other. The cinder cone and lava flow area provide excellent opportunities for education and study.

VI. SUPPLEMENTAL CHARACTERISTICS

Amboy Crater, one of the few easily accessible cinder cones that has not been disturbed by cinder mining activity, has both geological and educational significance.

VII. SUMMARY OF PUBLIC COMMENTS

Comments supported inclusion of the area due to the unique geological features.

AREA 305

I. PHYSICAL BOUNDARIES

This area is bounded to the north by telephone line and gas pipeline rights-of-way and the Atcheson, Topeka and Santa Fe Railroad line and maintenance road; to the east, by a high-capacity powerline right-of-way and accompanying road; to the south, by Highway 62; and, to the west, by a wood pole powerline road, a section of Amboy Road, a graded road through homesteads, and the old paved Iron Age Mine Road.

II. LAND OWNERSHIP

Two distinct patterns of land ownership occur: the northern two-thirds of the area contains public and non-public holdings in an alternating north-south strip pattern; the southern third is largely public land, with non-public holdings in scattered sections.

III. DESCRIPTION OF ENVIRONMENT

The area contains two immense desert valleys, Cadiz and Sheephole, each bounded by steep, but rounded, granitic mountain masses. A small portion of Ward Valley, containing Danby Dry Lake, is also located within the roadless area. The Sheephole and Iron Mountains comprise the main masses in the area, while the Calumets and the Kilbeck Hills are smaller isolated mountains. Cadiz Valley is the larger of the two valleys, but also the most impacted by man. Both valleys contain dry lakes at their centers. A small dune system is located in Cadiz Valley north of the dry lake. Vegetation is relatively sparse in both valleys, although Sheephole Valley vegetation is more lush. Creosote, galleta grass, and mixed shrubs dominate the valley vegetation. Plants are almost nonexistent on the dry lakes and on the mountain slopes.

IV. NATURAL CONDITION

Boundary adjustments have been made in order to account for roads and to exclude from further wilderness consideration those portions where man's influence has destroyed the natural character and opportunities for solitude. The entire eastern half of the roadless area has been so excluded. Man's works in the excluded areas include numerous chemical operations on Cadiz Lake (with many trenches, dredge piles, and graded roads); salt works on Danby Lake; existing and abandoned mines (one in the northern Kilbeck Hills and one near the Iron Mountain Pumping Station, both with major surface scars and slag piles); the Iron Mountain Pumping Station; and, numerous primitive ways around Cadiz and Danby Dry Lakes, near the dunes, and southeast of the Calumet Mountains. A short loop-road associated with the Colorado River Aqueduct enters the area at the southeast corner, and a well-maintained dirt road penetrates to the heart of Cadiz Valley leading to the Cadiz Lake chemical operations. These internal man-made features, most of them highly visible due to their location in the broad, flat valleys, greatly affect the natural character of the area. The Old Patton Road, the northern half of which is now unimproved, forms the eastern boundary of the area, and is easily recognizable from the ground. The small boundary adjustment on the western edge of the roadless area is due to the exclusion of a telephone line road, the tunnels and debris of the abandoned Sheephole Mine and the private homestead north of Dale Lake. The remainder of the area, which mostly includes Sheephole Valley and adjacent mountains, is relatively pristine. Man's works, which include only a few primitive ways and one abandoned mine on the east slope of the Sheephole Mountains, are substantially unnoticeable there due to screening by vegetation and distance. This valley is one of the few remaining relatively pristine valleys in the desert.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

The valley and terrain variety in the mountains offer outstanding opportunities for solitude and for a primitive and unconfined type of recreation. Opportunities for solitude become outstanding with distance from the edges. The valley provides seemingly endless, unobstructed vistas of natural desert scenery, while the surrounding mountains offer even more seclusion within the many canyons and coves. The relative absence of man-made features within the area enhances its unconfined character. The main feature of this area is the outstanding opportunity for recreation which takes advantage of the vastness and spaciousness provided in a broad, sweeping valley. Sheephole Valley successfully combines a sense of vastness to the north and south, with some sense of enclosure provided by the linear mountain ranges to the east and west.

VI. SUMMARY OF PUBLIC COMMENTS

A large number of comments indicated that the potential Wilderness Study Area should be expanded. Other comments referred to aceess routes into the area shown as having wilderness values. No additional change was made in the findings as a result of these comments.

AREA 307

I. PHYSICAL BOUNDARIES

This extremely large area is bounded on the west by a well-maintained telephone line road; on the east by Highway 95; on the south by Highway 62, the California River Aqueduct, and a railroad line; and, on the north, by a maintained mining access road and the county-maintained Turtle Mountain Road.

II. LAND OWNERSHIP

Public lands comprise of all but 14 scattered sections of land.

III. DESCRIPTION OF ENVIRONMENT

The area comprises a diverse landscape, ranging from broad, open bajadas to highly eroded spires and cliffs. The northeast half of the mountain range is characterized by steep, highly eroded volcanic spires and peaks, while the southwest section has a steep, but rounded, form. Between the two mountain sections lies a large, flat interior valley that is transected by numerous shallow washes. Vegetation occurs throughout the area and is relatively lush on the bajadas which completely surround the mountains. The interior valley is dominated by fairly dense stands of creosote, cactus, and mixed shrubs. Vegetation on the mountain slopes is more sparsely distributed, except in the canyons and washes, where palo verde, acacia, and other wash-type plants add to the diversity. The Mopah Springs site is noted for its small cluster of native fan palms, being the northernmost extension of this species.

IV. NATURAL CONDITION

The bulk of the area generally retains its primeval character. Some boundaries have been adjusted to exclude areas where man's activities have degraded the apparent naturalness. A primitive way has been chosen as the boundary on the southwest side, thereby excluding a network of unimproved ways located west of the new boundary. Another primitive way has been chosen as a southern boundary, thereby excluding the extensive system of flood-control dikes that border the Colorado River Aqueduct. Both primitive ways used as boundaries have been utilized in the past as routes for the Parker 400. The northeast corner of the roadless area has been excluded due to the presence of an active mine and evidence of past intensive use on desert pavement by tanks and other military equipment during Operation Desert Strike. A mining area on the west side of the mountains has been excluded along with the access route to it. Cabins, metal sheds, tunnels, and tailings are scattered throughout the area. Similarly, a perlite mine on the east side of the mountains and a mining area at the north tip of the mountains have been excluded due to their impacts, which include road scars, slag piles, and old cabins. A short road also enters from the north leading to a trailer which lies to the west of Mohawk Springs. The remainder of the area is relatively free from man's influence; its natural character intact. Man's impacts, which include some primitive ways to abandoned mines and cabins (Horn Springs, Carson's Well, the entrance to Mopah Springs Canyon, and others), are substantially unnoticeable due to terrain variety and sheer distance. Overall, the area appears to have been affected primarily by the forces of nature.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

The vastness and conformity of the area allows a relative freedom of unconfined movement. The diverse topography and relatively dense vegetation offer a degree of visual screening that allows the area to accommodate a large number of visitors without reducing opportunities for solitude. The steep volcanic and granitic cliffs and spires offer excellent opportunities for mountain and rock climbing. The presence of various springs in the area enhances its primitive recreation potential.

VI. SUPPLEMENTAL CHARACTERISTICS

The Turtle Mountains have not yet been studied in detail for their unique qualities but do have outstanding volcanic formations in the northeast portion. Mopah Springs carries the distinction of being the northernmost known native palm oasis. Bighorn sheep have been sighted throughout the area. Numerous historic mining areas are located throughout.

VII. SUMMARY OF PUBLIC COMMENTS

Comments referred to the following: presence of roads inside the potential Wilderness Study Area, mineral potential, unique geology, outstanding primitive recreation potential, and outstanding solitude. The roads were field checked and found to be ways in most cases. The narrative indicates those areas excluded.

Appendix E-2: Impairment Criteria, from "Interim Management Policy and Guidelines for Lands Under Wilderness Review", USDI, Bureau of Land Management, December 12, 1979.

Nonimpairment Criteria

The following three criteria, previously set forth in Chapter I. B. 2 of this document, are referred to many times in this chapter as the "nonimpairment criteria." They are restated here for ready reference.

Activities will be considered nonimpairing if the BLM determines that they meet each of the following criteria:

(a) It is temporary. This means that the use or activity may continue until the time when it must be terminated in order to meet the reclamation requirement of paragraphs (b) and (c) below. A temporary use that creates no new surface disturbance may continue unless Congress designates the area as wilderness, so long as it can easily and immediately be terminated at that time, if necessary to management of the area as wilderness.

(b) Any temporary impacts caused by the activity must, at a minimum, be capable of being reclaimed to a condition of being substantially unnoticeable in the wilderness study area (or inventory unit) as a whole by the time the Secretary of the Interior is scheduled to send his recommendations on that area to the President, and the operator will be required to reclaim the impacts to that standard by that date. If the wilderness study is postponed, the reclamation deadline will be extended accordingly. If the wilderness study is accelerated, the reclamation deadline will not be changed. A full schedule of wilderness studies will be developed by the Department upon completion of the intensive wilderness inventory. In the meantime, in areas not yet scheduled for wilderness study, the reclamation will be scheduled for completion within 4 years after approval of the activity. (Obviously, if and when the Interim Management Policy ceases to apply to an inventory unit dropped from wilderness review following a final wilderness inventory decision of the BLM State Director, the reclamation deadline previously specified will cease to apply.) The Secretary's schedule for transmitting his recommendations to the President will not be changed as a result of any unexpected inability to complete the reclamation by the specified date, and such inability will not constrain the Secretary's recommendation with respect to the area's suitability or nonsuitability for preservation as wilderness.

The reclamation will, to the extent practicable, be done while the activity is in progress. Reclamation will include the complete recontouring of all cuts and fills to blend with the natural topography, the replacement of topsoil, and the restoration of plant cover at least to the point where natural succession is occurring. Plant cover will be restored by means of reseeding or replanting, using species previously occurring in the area. If necessary, irrigation will be required. The reclamation will be complete, and the impacts will be substantially unnoticeable in the area as a whole, by the time the Secretary is scheduled to send his recommendations to the President. ("Substantially unnoticeable" is defined in Appendix F.)

(c) When the activity is terminated, and after any needed reclamation is complete, the area's wilderness values must not have been degraded so far, compared with the area's values for other purposes, as to significantly constrain the Secretary's recommendation with respect to the area's suitability or nonsuitability for preservation as wilderness. The wilderness values to be considered are those mentioned in section 2(c) of the Wilderness Act, including naturalness, outstanding opportunities for solitude or for primitive and unconfined recreation, and ecological, geological or other features of scientific, educational, scenic, or historical value.

Appendix E-3: Guidelines for recreation, from "Interim Management Policy and Guidelines for Lands Under Wilderness Review," USDI, Bureau of Land Management, December 12, 1979.

Chapter III. Guidelines for Specific Activities

The guidelines in this chapter are an application of the Interim Management Policy (IMP) to some of the most common activities that take place on the public lands. It should be recognized that factors other than the IMP enter into the decisions made by the Bureau of Land Management on specific projects and activities — among them the laws, policies, and regulations governing that type of activity, and resource management plans for the affected land.

The decisions on most of these activities will be made by BLM field officials. These decisions will not be a matter of simply approving or denying proposals. BLM field officials will assist applicants to find ways, if possible, of achieving their goals by methods that are consistent with the Interim Management Policy. To be sure, activities that cause major surface disturbance are not likely to be consistent with the IMP, except in grandfathered uses and valid existing rights. But many activities can be designed and carried out in a manner that does not cause such major disturbance, and these may be able to satisfy the IMP requirements.

A. Recreation

Most recreation activities (including fishing and hunting) are permitted on lands under wilderness review. However, some activities may be prohibited or restricted because they require permanent structures or because they depend on cross-country use of motor vehicles (for example: pickup vehicles for balloons or sailplanes).

BLM will analyze the magnitude of all proposed activities to ensure that recreation use will not cause impacts that impair the area's wilderness suitability.

Most recreation uses take place under general permission from the BLM rather than under specific project applications. There is a possibility that a continuing use or an increasing use could gradually cause increased impacts and, over time, impair the area's wilderness suitability. An example might be erosion caused by increased off-road vehicle travel on trails. To prevent this type of impairment caused by cumulative impacts, the BLM will monitor ongoing recreation uses and, if necessary, adjust the time, location, or quantity of use, or prohibit that use in the impacted area.

1. No new permanent recreational roads, structures, or installations will be permitted, except structures or installations that are the minimum necessary for human health and safety or the minimum necessary for public enjoyment of wilderness values. In these cases, facilities will be installed so that they are substantially unnoticeable and minimize surface disturbance. Temporary access routes, structures, and installations may be permitted if they meet the nonimpairment criteria.

2. Hobby collecting of mineral specimens (rockhounding) and vegetative specimens may be permitted.

3. Recreational use of off-road vehicles (ORVs) may be permitted on existing ways and trails and within "open" areas designated prior to approval of FLPMA (October 21, 1976). The BLM will cooperate with ORV organizations to achieve the least amount of new impact on lands under wilderness review. If impacts of ORVs, either on or off existing ways and trails, threaten to impair the area's wilderness suitability, the BLM may close the affected lands to the type of ORVs causing the problem. In some cases, time or space zoning, public education, or a rest-rotation system may make a total closure unnecessary.

No lands will be designated as "closed" solely because they are under wilderness review, but if increasing impacts threaten to impair wilderness suitability, the BLM will move to control those impacts and may designate the area as "closed" to the type of vehicles causing the problem, in order to control the impacts. The Bureau also has authority under other programs to regulate ORV use to minimize damage to wildlife and other resource values.

4. Organized ORV events may be allowed to pass through areas under wilderness review on existing ways and trails, so long as the BLM has determined that such use satisfies the nonimpairment criteria. Participants and spectators using ORVs will be restricted to the designated ways and trails, which will be appropriately flagged. Assembly areas, start or finish lines, and gasoline pit stops will not be allowed. Care will be taken to ensure that the event and its impacts will not cause degradation of the area's wilderness values (including archeological and paleontological values) so far, compared with the area's values for other purposes, as to significantly constrain the Secretary's recommendation with respect to the area's suitability or nonsuitability for preservation as wilderness.

Based on past practice, it is expected that ORV events involving cross-country travel (off existing ways and trails) as part of the route would rarely satisfy the nonimpairment criteria. However, if the BLM determines that the event can and will be carefully controlled to ensure that it fully satisfies the nonimpairment criteria, the use of cross-country route segments may be approved. Participants and spectators using ORVs will be restricted to the designated route and designated spectator zones, which will be appropriately flagged. Any impacts caused by the event must be reclaimed as specified in the nonimpairment criteria; therefore, the cross-country route segment and the spectator zones will not be open to recreational ORV use except during the event. Assembly areas, start or finish lines, and gasoline pit stops will not be allowed. Care will be taken to ensure that the event and its impacts will not cause degradation of the area's wilderness values (including archeological and paleontological values) so far, compared with the area's values for other purposes, as to significantly constrain the Secretary's recommendation with respect to the area's suitability or nonsuitability for preservation as wilderness.

5. Vehicles designed for travel across snow or sand dunes may be permitted cross-country in areas designated for use by snow or sand vehicles. These vehicles may also be permitted on existing ways and trails under the guidelines in sections 3 and 4 above.

6. Facilities necessary for visitors' health and safety may be provided in either of two ways: (a) permanent facilities that are the minimum necessary for public enjoyment of wilderness values (for example: vault toilets, water well with hand pump); (b) temporary facilities that meet the nonimpairment criteria (for example: portable toilets). These facilities will be installed so that they are substantially unnoticeable and minimize surface disturbance.

7. Boating may be permitted, with or without motors. The BLM does not necessarily have authority over all waters within the public lands; some are under jurisdiction of the States. Therefore, the following guidelines apply only to those waters on which the BLM has authority to regulate boating.

No waters will be closed to motorboats solely because they are in areas under wilderness review, but if increasing impacts of boating (such as shore erosion or water pollution) threaten to impair wilderness suitability, the BLM may close the affected waters to motorboats. In some cases, time or space zoning or public education may make a total closure unnecessary. The Bureau also has authority under other programs to regulate boating to minimize damage to wildlife and other resource values.

River running, with or without motors, may be permitted. Cumulative impacts on river campsites will be monitored to prevent impairment of wilderness suitability.

No permanent launching ramps or boat docks will be built. A "brow log" may be used to reduce erosion at boat landings. Temporary launching ramps and boat docks may be installed only if they satisfy the nonimpairment criteria.

8. Environmental education and interpretive programs may be conducted so long as no permanent facilities are required.

9. New trails for foot or horse travel may be built, if they are the minimum necessary for public enjoyment of wilderness values and are constructed in a manner that causes minimal surface disturbance and ensures that the trails blend into the natural setting. Motor vehicles will not be permitted on the new foot or horse trails.

10. Camping may be permitted. Campsites for primitive recreation use may be established if they are the minimum necessary for public enjoyment of wilderness values. Otherwise, campsites and campgrounds may be installed only if they are temporary facilities that satisfy the nonimpairment criteria. Camping with recreational vehicles may occur along existing ways so long as this use satisfies the nonimpairment criteria.

11. Cross-country skiing may be permitted. Downhill (Alpine) skiing may be permitted only if any support facilities are temporary ones that satisfy the nonimpairment criteria.

12. Aerial activities may be permitted so long as they do not require the use of motorized vehicles off ways and trails to retrieve equipment, except in areas designated as "open" before October 21, 1976. Among these are ballooning, sailplaning, hang gliding, and parachuting (sky diving).

13. Recreational gold dredging and panning, when conducted without location of a mining claim, may be permitted so long as it is done in a manner that satisfies the nonimpairment criteria. If the activity would cause significant damage to fish spawning or rearing areas lasting after the Secretary is scheduled to send his wilderness recommendation on the area to the President, it will be considered to impair wilderness suitability, and the activity will be controlled to prevent such impacts. (This activity is so regulated because it is not done on a mining claim, and therefore is not covered by the exception for "appropriation under the mining laws.") In locations where gold dredging or panning was being done as of October 21, 1976, it may qualify as a grandfathered use. (For further information on grandfathered uses see Chapter I. B. 6.)

14. Concessions will be permitted only if the use and related facilities are temporary and satisfy the nonimpairment criteria. Examples that may qualify include mobile refreshment stands, river trip outfitters, guides, and providers of pack animals and saddle horses.

B. Cultural and Paleontological Resources

Cultural and paleontological resource inventories, studies, and research involving surface examination or limited subsurface sampling may be permitted. Salvage of archeological and paleontological sites; rehabilitation, stabilization, reconstruction, and restoration work on historic structures; excavation; and extensive surface collection may be permitted if the specific project satisfies the nonimpairment criteria. Permanent physical protection, such as fences, will be limited to those measures needed to protect high-value resources, and will be substantially unnoticeable in the area as a whole.

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